3333 CALIFORNIA STREET MIXED-USE PROJECT

RESPONSES TO COMMENTS ON DRAFT EIR VOLUME 2 (ATTACHMENTS A-E, PART 3)

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - JANUARY 8, 2019
FINAL EIR CERTIFICATION HEARING: SEPTEMBER 5, 2019
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Comment Letters and E-mails Received After Close of Public Comment Period
August 12, 2019

Supervisor Catherine Stefani

1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Dear Supervisor Stefani,

PHRA is writing to state our support for the Prado Group’s plan for the 3333 California proposal.

Over several years we have attended many meetings and presentations by the developers, and have participated in discussions between the developers and neighborhood groups. The plan that is currently presented includes alterations made to accommodate neighbors’ comments. Throughout the discussions, PHRA has been most concerned about parking and circulation in and around the property. We wish to continue to be involved in discussions with the developers, city agencies, your office, and other neighbors and merchants to help address parking and traffic solutions.

This is clearly a very significant property that will undoubtedly change the neighborhood, but it is very large and strategically located. We do not find the Fireman’s Fund building historically significant, or important to the community. If left unused and underdeveloped it will be a magnet for blight and undesirable activity. Conversely, if the property is developed as proposed, it will bring desperately needed housing, appropriate for the setting and the neighborhood, to a significant transit corridor.

PHRA would like to participate in discussions about staging and construction, throughout the process.

PHRA is available to answer any questions, or comment more fully at your convenience.

Thank you.

Terry McGuire

PHRA President
PACIFIC HEIGHTS RESIDENTS ASSOCIATION

2443 Fillmore Street #178
San Francisco, California 94115

Sincerely,

L. Gregory Scott
Treasurer

CC: Scott Sanchez, Zoning Administrator
Dear Supervisor Stefani:

Please find attached a letter of support from the Presidio Heights Association of Neighbors for the project currently being proposed for the site at 3333 California Street. We are sending this letter to you and the members of the Planning Commission listed above in the hope that you also will join us in supporting this project as it is currently proposed.

Thank you for your consideration.

Charles Ferguson
President
Presidio Heights Association of Neighbors
Presidio Heights Association of Neighbors

July 29, 2019

Supervisor Catherine Stefani
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, Ca. 94102-4689

Re: Proposed Project at 3333 California Street, former UCSF Laurel Heights Campus

Dear Supervisor Stefani:

I am the President of the Presidio Heights Association of Neighbors (PHAN) and, on behalf of PHAN, I am writing to convey PHAN’s support for the proposed development plan for the former UCSF Laurel Heights Campus site, whose street address is 3333 California Street.

This will certainly be a very significant development project and it is directly adjacent to the southern border of our neighborhood. Our neighborhood is well over a century old and is comprised of 800 residences, most of which (perhaps over 90%) are eligible for inclusion on the State Historic Register. The entire neighborhood is itself eligible for inclusion on the State Historic Register as an historic district, something which few neighborhoods in San Francisco can claim. As you are probably aware, Presidio Heights includes some of the most revered architectural homes in America. None of the other neighborhoods adjacent to the 3333 California Street site are as old or can claim as many architectural treasures. Equally important to the residents of Presidio Heights is the fact that from its inception to the present, against an appalling decline citywide in the number of families with children, it has retained its reputation as a family-oriented neighborhood. Thus, the impact on our neighborhood of any development at 3333 California Street is of critical importance to all our residents. Accordingly, the directors of PHAN have carefully followed the plans for development of 3333 California Street as those plans have evolved during the application process. I am pleased to inform you that the PHAN board of directors has voted in favor of informing you that PHAN supports the current project as proposed by the sponsor in both its original and alternative format.

For the past nearly three years, I and fellow directors of mine have participated in numerous meetings regarding development of 3333 California Street. Likewise, we have met on many occasions to discuss concerns that we and residents of Presidio Heights had regarding various aspects of the project. Fortunately, the developer of 3333 California Street was quick to adopt the same laudable process that was mandated for the development of the CPMC site at 3700 California Street, a process that I personally
worked on with former Mayor/Supervisor Mark Farrell to embed in the City’s
development agreement for the new CPMC hospital on Van Ness Avenue. I am pleased
to report that not only has the developer of 3700 California Street met CPMC’s
commitment that the purchaser of 3700 California Street would be bound to meet with
and listen to neighborhood concerns, but the developer of 3333 California Street has
voluntarily adopted the same obligation to meet with and give thoughtful consideration to
neighborhood concerns, at least insofar as the PHAN board of directors is concerned.

I want to express our strong support for and appreciation of this proactive and interactive
approach to such a significant redevelopment project. We hope that this approach will set
an example for future projects in the City and that the Planning Department, Planning
Commission and your Board, if necessary, will support the extensive effort that has gone
into this process by favorably acting on those plans when presented.

The outreach from the project team has been extensive and the development team has
listened to numerous comments from the neighborhood regarding the types of housing,
design, parking, and other key project elements in developing the plan which will soon be
submitted to the Planning Department as part of the Preliminary Project Assessment. We
feel the developer has studied our neighborhood to develop a plan that is respectful of the
surrounding community and is consistent with the existing neighborhood pattern. In the
process, numerous design changes were made to respond to neighborhood comments in
order to develop a plan that has support from as many neighbors and neighborhood
groups as possible.

We also thoroughly support the amount of parking requested by the project and would
support additional parking consistent with the parking in the surrounding neighborhood if
the Planning Department and Planning Commission are willing to support it. We have
endured our neighborhood being inundated with high parking demand from the under-
parked hospital for too long and want both 3700 and 3333 California Street projects built
with an adequate number of parking spaces, particularly given the likelihood that larger
units with families will likely require more than one car to manage the challenges of
raising multiple children in the City.

Finally, I will take this opportunity to add a personal note. My wife and I have owned an
architecturally significant home at The Sea Ranch for over 30 years, William Turnbull’s
first single family home, known as Experimental House One. It sits adjacent to the well-
known Esherick Hedgerow Houses, on the nearly sacred ground for architects where the
first few houses at Sea Ranch were constructed. Turnbull redesigned our house for us
before his untimely death, so I know from personal experience this one truth about
preservation of architecturally significant structures and it is simply this. They cannot
and do not survive well with age if left in their original state. They can be, and must be,
repurposed over time if they are to survive at all. The old Firemen’s Fund headquarters at 3333 California Street is in serious need of repurposing and I, personally, as well as the majority of my fellow board members support the plans for repurposing it that are before the Planning Department and Commission now.

In closing, we applaud the process that has led to the current development plans for 3333 California Street, and we ask that the Planning Department, the Commission and you provide the same support for the project as we do.

Sincerely,

[Signature]

Charles Ferguson
President
Presidio Heights Association of Neighbors
Dear Supervisor Stefani and Planning Commissioners,

Laurel Heights Partners, LLC presented the 3333 California Street project in Laurel Heights to SPUR’s Project Review Advisory Board at our May 2019 meeting for review and consideration. SPUR is generally focused on policies, plans and codes rather than on individual projects. In order to make infill development easier, we prefer to help set good rules around zoning, fees, housing affordability, sustainability, etc. However, on occasion, SPUR’s Project Review Advisory Board will review and endorse development proposals of citywide or regional importance, evaluating their potential to enhance the vitality of the city and region according to the policy priorities and principles of good placemaking supported by SPUR.

The SPUR Project Review Advisory Board finds this development to be an appropriate and welcome use for this site and endorses 3333 California Street.

Please see attached letter for full details. Do not hesitate to reach out if you have any questions.

Best,
Kristy Wang

Kristy Wang, LEED AP
Community Planning Policy Director
SPUR • Ideas + Action for a Better City
(415) 644-4884
(415) 425-8460 m
kwang@spur.org
June 3, 2019

Supervisor Catherine Stefani
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: SPUR Endorsement of 3333 California Street

Dear Supervisor Stefani and Planning Commissioners:

Laurel Heights Partners, LLC presented the 3333 California Street project in Laurel Heights to SPUR’s Project Review Advisory Board at our May 2019 meeting for review and consideration. The SPUR Project Review Advisory Board finds this development to be an appropriate and welcome use for this site and endorses 3333 California Street.

SPUR is generally focused on policies, plans and codes rather than on individual projects. In order to make infill development easier, we prefer to help set good rules around zoning, fees, housing affordability, sustainability, etc. However, on occasion, SPUR’s Project Review Advisory Board will review and endorse development proposals of citywide or regional importance, evaluating their potential to enhance the vitality of the city and region according to the policy priorities and principles of good placemaking supported by SPUR.

3333 California Street is a major mixed-use development project planned for a 10.25-acre parcel in the Presidio Heights neighborhood. The site is currently occupied by UCSF’s Laurel Heights campus. The proposed project will transform the site from a corporate campus with office, research, child care and parking uses into a mixed-use neighborhood with residential, retail, office, child care and parking uses. 3333 California Street will include 13 new buildings and the adaptive reuse of the existing office building, which would be split into two residential buildings.

Laurel Heights Partners is considering two variations on the project, one of which includes more housing units instead of office space. The project will include between 558 and 743 residential units, up to 49,999 square feet of office space, 34,000 to 40,000 square feet of retail and 13,000-15,000 square feet of child
care space. The SPUR Project Review Advisory Board prefers the proposal with higher residential density.

3333 California Street in Laurel Heights:

- **Is located at an appropriate location for development**, near transit and infrastructure and not on a greenfield site. This site is located near the future Geary bus rapid transit (BRT) line and several other good bus lines that run frequently. The site has been underutilized to date, with buildings on only 3 of its 10 acres, in spite of being located at the intersection of many neighborhoods and close to many amenities.

- **Provides an appropriate mix of land uses** of residential and retail, contributing to diverse stock of housing, fostering economic development, providing amenities and services to the surrounding community. The proposed project would bring new housing to a part of the city that has seen little new residential development, and it includes a significant retail component that ties into the existing Laurel Village corridor.

- **Provides sufficient density at the site** at 54 to 72 dwelling units per acre, supporting adjacent transit and prevents underutilization of land, serving the future needs of Bay Area residents. This project makes good use of this key site, which has been until now a suburban campus walled off from the adjacent neighborhoods.

- **Creates a good place for people and contributes to a walkable environment** with active ground floor uses. The plan for the site integrates the proposed buildings into the neighborhood, connecting to cross streets and breaking up the superblock into more appropriately scaled street blocks. The retail uses along California Street connect visually and functionally to the existing Laurel Village retail corridor, and the other street frontages have designed to be porous and pedestrian-friendly. The public realm plan, which includes several different kinds of public and open spaces, brings the public into and across the project site.

The SPUR Project Review Advisory Board finds this development to be an appropriate and welcome use for this site and endorses 3333 California Street. The urban design and site plan are particularly thoughtful, especially in dealing with the major grade changes at this location. The quantity, quality and variety of open space are excellent, and we appreciate the project team’s decision to protect some of the older trees onsite as well as adapt the existing building to a new use. We also appreciate that the project team includes several different architects and landscape architects, helping to foster the feeling of a neighborhood built over time rather than a single master-planned project.

The potential partnership with the Jewish Community Center is an excellent idea that could help fill retail spaces if there is not sufficient retail demand in the neighborhood. We are also impressed with the neighborhood outreach given the sensitivity and location of this site.
Our only concern with this plan is the amount of parking. While we appreciate that all parking will be tucked out of sight in underground parking garages in order to maximize the useable open space, we feel that the project parking could be further reduced. Given the project’s transit-oriented location near many bus lines, the Geary BRT line currently underway, and our city’s evolving transportation options, SPUR recommends that the project sponsor consider reducing the number of parking spaces.

Please do not hesitate to contact us or Kristy Wang, SPUR’s Community Planning Policy Director, with any questions or clarifications.

Sincerely,

Charmaine Curtis          Diane Filippi
Co-Chairs, SPUR Project Review Advisory Board

cc:   SPUR Board of Directors
Dear Supervisor Stefani and Members of the Planning Commission Team,

Attached please find a letter regarding the proposed development at 3333 California Street.

Thank you for your time and consideration.

Will Bartlett
VIA EMAIL

June 1, 2019

Supervisor Catherine Stefani
Commissioner Myrna Melgar
Commissioner Joel Koppel
Commissioner Rich Hillis
Commissioner Milicent Johnson
Commissioner Kathrin Moore
Commissioner Dennis Richards
Commissioner Frank Fung
Senior Environmental Planner Kei Zushi

Re: 3333 California Street Proposed Development

Dear Supervisor Stefani and Esteemed Members of the Planning Commission:

I am writing to you as a neighbor in support of the proposed development at 3333 California Street. I have lived in the area for the last 30+ years and look forward to seeing the current eyesore at the site razed and replaced with a beautiful, well thought out, addition to our neighborhood. The proposed project would bring much needed housing to San Francisco as well as more retail, restaurants, and open space that our family could easily walk to. In addition to improving our neighborhood and providing housing, this project will generate substantial tax revenue for San Francisco.

The development team has put in a substantial effort to engage with the community and has been responsive and proactive in making changes based on feedback received. I have no doubt they will continue to be good neighbors throughout the development and construction process.

I urge you to support this family-oriented project that will improve our neighborhood and the City.

Respectfully,

[Signature]

William F. Bartlett
Please see attached letter in support of this important project.

Thank you.

Suzanne

Suzanne Blumenthal
415.309.1355
June 16, 2019

Dear Sir or Madam:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing—a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of the neighborhood, I’ve seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco’s west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Suzanne Blumenthal
Dear Supervisor Stefani / Members of the San Francisco Planning Commission

I am writing to urge you to support the proposed development at 3333 California Street. From my perspective, a Presidio Heights neighbor of the project for 70 years, with children and grandchildren in the neighborhood as well, there are three reasons this project should be approved.

1) Provides a positive response to the current housing crisis: This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood. The proposal will connect the existing site to the greater Laurel Heights community, creating open spaces, community amenities, and homes.

2) Opens up what has been a closed off 5 acres: In addition to allowing more people to remain in the city and bringing new homes to San Francisco’s west side, the proposed development will provide over 5 acres of open space, where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. I was born on Clay Street between Locust and Spruce in 1947. I have a daughter and grandchildren living near Laurel Village. I live close to the JCC. It would be wonderful to be able to walk from California Street to Euclid or Presidio to Laurel!...before I become 100 years old! The proposed pedestrian walkways through the site will make my wish come true. It will connect neighbors in the Laurel Village and surrounding neighborhoods by reimagining the currently walled-off space on the UCSF campus.

3) Expands “shop/dine small business” opportunities: Our family often walks/shops Fillmore Street, Sacramento Street, and Laurel Village, frequenting the various merchants and restaurants. We would welcome new stores, especially the proposed smaller, non-traditional "big box" variety and new, casual, moderately priced places to eat breakfast/lunch/ dinner

San Francisco is an innovative city that values inclusion, diversity, and community. I sincerely hope that you will support the proposed development at 3333 California Street for the reasons stated above.

Sincerely,

Lynn

Lynn Burrows Bunim
2017 Lyon Street
San Francisco, CA 94115
lbunim@pacbell.net
Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of San Francisco, I’ve seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

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A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Ryan Chatley
99 Uranus Terrace, San Francisco
Supervisor Stefani,

As a resident of San Francisco and D2, I want to write and share my student support for the redevelopment plans at the UCSF Laurel Heights Campus. This type of urban infill is just the type of development that San Francisco needs in every corner of the city, and I urge you and the rest of city government to support it and help expedite it.

**It'll be well served by improved Muni Service:**
It's a lovely old corporate campus, and it's at the hub of several high density transit lines (1 california, 2 clement, 3 jackson, 43 masonic, hell even the 38 Geary).

**And it's in a scale appropriate to the neighborhood.** I'm super excited by the additional retail space to Laurel Village, and also the improved pedestrian flow to the the site-- I love the two paths through the site.

Please approve this without delay!

Best,

Shanan Delp
Richard Frisbie here.
As you were not at yesterday's Planning Commission meeting I am attaching my notes concerning 3333 California St. for your consideration.
If you have any questions please let me know.
Thanks,
Richard Frisbie
Good afternoon President Melgar and Commissioners. 
I am Dick Frisbie. 
I’d like to continue the discussion on 3333 California St.

Take a look at the starred item; the Developer is requesting a 15 year entitlement period which is outrageous.

NEXT SLIDE
Can any of you imagine living next to, or actually inside of, a construction site that goes on for up to 15 years? No one should be exposed to such abuse.
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 several 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 into entering into a development agreement (DA) with the City for a term of approximately 15 years. For larger projects with multiple buildings like 2500 California Street, the City generally requires a DA. The DA contains the entitlements, protecting the entitlements from changes in the law in exchange for certain community benefits. This would enable 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 is the period of time that you anticipate that construction will occur?

A: We anticipate that construction will occur in the spring of 2020.

Q: What is the reason for constructing the project in phases?

A: By allowing for potential phased construction, we would have the ability to complete and occupy portions of the project as each phase is completed. If conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability.

Q: How many extensions do you anticipate requesting for the entitlements?

A: None. Any extension of the DA's term would be a material amendment that would require Board of Supervisor's approval.

Q: During those extended periods, would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased numbers of residential units, increased amounts of retail or office space? What about the possibility of design changes or other changes? Could Prado apply to change any part of the construction to provide the opportunity to have high rise construction?

A: Once the EIR is certified and the project is approved, any material changes to the project would be subject to new environmental review, would require Planning Commission and Board of Supervisor approvals and also an amendment to the DA. Any increase in height over what is entitled in our project would require a revision to the Planning Code and Zoning Maps that would entail Planning Commission and Board of Supervisors approval.

Q: There are genuine concerns about reducing open spaces and reduced on-site parking places.

A: Open space will be part of the entitlements and will likely be considered by the City as one of the public benefits supporting the DA – for that reason alone, reducing the amount of it would be very difficult if not impossible. The open space requirements will be carefully described in the project's approvals and will also be recorded against the property. So, as with any material changes to the approved project, any material change to the open space would be very difficult and would involve a public process and City approval. As to parking spaces, as you know, the City would like to see the number of spaces reduced. We plan to continue advocating for the proposed number of project parking spaces in our application.

Q: During the phased construction could Prado transfer shares in the project to provide for new or additional investors?

A: We have no plan to transfer any shares in the project and construction lenders generally prohibit any changes of ownership by the project developer during construction and stabilization of a project. PSK, along with our equity partners and lenders, intend to provide all of the capital necessary to construct, own and operate the project. We plan to
So we asked the Developer about these issues.

**FIRST STARRED ITEM**

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?

Simple Answer: Yes
15 years

**PRETTY SELF EXPLANATORY.**

You gotta wonder about a Housing Crisis.
SECOND STARRED ITEM

Q: What is the reason for constructing the project in phases?
A: “If conditions do not exist to build out the entire project we can phase construction to align with market conditions and financing availability.”

“What a powerful, unambiguous commitment to Housing.
Could also mean they want to redo the entitlement, or sell it or…..Pick a reason
We’ll speak to this later.
THIRD STARRED ITEM:
Q: During those extended periods would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased number of residential units, increased amounts of retail or office space? Design Changes? Other Changes? High Rise Construction?

Simple answer “Sure.”
Nothing prevents us going back to Planning, the Commission and the Board of Supervisors and request such changes.

This opens up an immense opportunity for the Developer to radically redesign and up-zone the site!
This is simply a blank check.
FOURTH STARRED ITEM

Q: During the phased construction could Prado transfer share in the project to provide for new or additional investors?
A: “We have no plans to transfer any shares......

We’ll take a closer look at that answer momentarily as there is considerable information to the contrary.

THIS IS NOT A DEVELOPMENT PLAN ITS AN ENTITLEMENT SCHEME AS WE WILL SEE NEXT.
Read the lower box carefully “limit the City’s ability to rezone the site for a set period of time.”

First, no set period of time is stated which should ALWAYS raise red flags.

Let’s be generous and just put in 5 years. After 5 years the Developer could request an entirely new set of Zoning criteria for this site Taller, Denser, Retail Focused....... Bear in mind that after 5 years they haven’t actually created much housing according to their Phasing Plans and that’s assuming they don’t claim “Market conditions” as an excuse.

So the site may get rezoned before much actual work gets done.

Would it, Could it; Might it happen?
Folks, here’s reality.
This is the view of a pretty significant Developer in San Francisco. Every time you sell an entitlement the cost of the housing units go up—the original Developer needs to make his money, the new Developer needs to make his money starting with a higher cost basis.
So, any claims about “no intentions to transfer shares; if market conditions permit; limit the City’s ability to rezone the site” need to be taken with the biggest dose of salt one can swallow.
Housing is getting pricier and pricier and a 15 year entitlement guarantees more expensive housing.

BUILD THE HOUSING IN 3 YEARS AND A LOT LESS FINANCIAL ENGINEERING CAN TAKE PLACE.
I call this the Shadow Box Development as shown in the Top View. Lots of dark blue. Imagine living along those hardscaped concrete canyons? The Bottom View shows the Community Alternative—pretty stark differences. Just one quick reference: The childcare center playground is presently here – ion the sun-here and that’s where it will stay in the Community Alternative. In the Top View the childcare center playground is here in the Deep Blue up against the Credit Union. I’ll leave it to you to decide.

THANK YOU
Dear Supervisor Stefani and Planning Commissioners:

As a resident and small business owner who has lived and worked in the Presidio Heights neighborhood for 15 years, I am writing to express my support for the proposed development at 3333 California Street. The development at 3333 California would provide much needed housing, parking, commercial space, and open areas to the neighborhood.

Additionally, I am very concerned that the ongoing debate on this proposed project (along with the similar debate on the proposed project at the former CPMC hospital site on Cherry Street) will lead to perpetual construction delays and, eventually, result in two gigantic abandoned properties in the Presidio Heights, Laurel Heights and Jordan Park neighborhood that will attract homelessness, public drug use and crime. We have already seen a dramatic increase in vagrants, public drug use, and assaults on residents since these former properties have been vacated a short time ago.

I urge you to support this project so that construction can begin as quickly as possible to minimize the time of transition from one planned use of the space to another.

Sincerely,

Dr. Bella Shen Garnett

Bella Shen Garnett, DMD, MMSc, PC
Specialist in Orthodontics for Children & Adults
www.bellasmile.com (415)292-2345 **CONFIDENTIALITY NOTICE** This e-mail communication and any attachments may contain confidential and privileged information for the use of the designated recipients named above. Distribution, reproduction or any other use of this transmission by any party other than the intended recipient is prohibited. Please delete it and any attachments and notify the sender that you have received it in error. Unintended recipients are prohibited from taking action on the basis of information in this e-mail.
Dear Kei,

As a neighbor and resident who has lived in the neighborhood for almost forty years, I am writing to express my support for the proposed development at 3333 California Street. This thoughtfully developed project will create housing to help alleviate San Francisco’s housing crisis, while better connecting the Laurel Heights neighborhood for families.

The development at 3333 California would create 558 or 744 units, allowing more people to remain in the city and bringing new homes to San Francisco’s west side. Additionally, the proposed development will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco. The proposed pedestrian walkways through the site will connect neighbors in the Laurel Village and surrounding neighborhoods by reimagining the currently walled-off space on the UCSF campus. And with most units designed for two or more bedrooms, the project will be a fantastic place to raise a family and a great amenity for existing residents and neighbors.

I urge you to support this project that is thoughtfully developed and will create an opportunity for families to stay and thrive in our city. Our city is evolving and we are not addressing the needs of the people who make this city interesting. San Francisco is becoming a city for the 1% or the homeless and that is simply unacceptable.

Sincerely,

Massimiliana Boyer Glynn
Dear Supervisor / Planning Commissioner:

I strongly support the proposed development at 3333 California Street. The project has been thoughtfully developed with input from San Francisco residents. The property will address San Francisco’s housing crisis. In addition, the proposal will connect the existing site to the greater Laurel Heights community, creating open spaces, community amenities, and homes.

The project has sought community views on design and use. Throughout the design process, the developer held over 125 community meetings, and collaborated with two design-focused community advisory groups. These community leaders provided helpful suggestions that improve the project and enhance the neighborhood, and meet much needed new housing.

The development team changed the design multiple times to continue to improve the project after community input. With most units designed for two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a place to raise a family and an asset for everyone who lives in the neighborhood.

The project includes retail space to reduce the need to drive outside of the neighborhood. The proposed retail will be designed to fill-in where goods and services are lacking, complementing the existing retail establishments and helping to stitch the neighborhood together. After collaboration with stakeholders, the designs were updated to fit with the neighborhood’s ‘classic San Francisco’ feel. The development fits into the neighborhood’s character. To keep the Laurel Heights community family-friendly, the project includes a mix of apartments and townhomes.

I look forward to the contribution of this project to the character of the neighborhood. It is a project that will result in a beneficial relationship of the development, the neighborhood, and the city.

Sincerely,

Jeremiah F Hallisey
Jeremiah F. Hallisey
Hallisey and Johnson
465 California Street, Suite 405
San Francisco, CA 94104
Telephone: (415) 433-5300

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The foregoing applies even if this notice is embedded in a message that is forwarded or attached.
Supervisor Stefani and Planning Commissioners,
I wanted to express my strong interest in this project at 3333 California Street. These are the types of projects that can revitalize neighborhoods and maximize use of great urban real estate for more housing. I am a 3rd generation SF native and current homeowner, and strongly believe that we need to continue to build responsible housing projects like this! Great open space component, and I love the community that it will build in that area. More walkable streets in that area will create a whole new neighborhood and add vibrancy to what is only a drive-through area. The potential for new restaurants/bars/cafes is really exciting!

Thanks,
Will Holleran
Dear Mr. Zushi,

Thank you for the opportunity to submit my limited comments and the adequacy of UCSF's DEIR for their 3333 California Street project.

I was born and raised in San Francisco. I'm a homeowner / resident of San Francisco, seventy plus years and live in District 7. I all too often shop at the Laurel Village Shopping area and know of this site all too well.

I have reviewed UCSF's DEIR, case 2015-014028ENV and adding my limited comments to this DEIR, a job well done with the DEIR.

Focusing mostly on the Housing part of the DEIR and Project.

Wow, how impressive it is to see the amount of housing that will be developed on this site for a total of 558 units, including adding up to 27 units of four bedroom units, almost the first of its kind! This will definitely help with our current Housing issues. In general, we need this housing as fast as we can get it built. The open space is an exciting proposal. The overall architecture of the buildings, the landscaping and the mixed use of the site has been well thought out. With all that said, in my opinion this DEIR covers most import issues and I fully support UCSF's project and the adequacy of this DEIR.

UCSF continues to add value to the city it serves and is a great asset to the city. As I mentioned we need to approve this all too Wonderful PROJECT.

Finally, in closing I would like to see this project placed on an expedited process from now thru the final Certification of the DEIR thru the Permit process. We need this housing. We can not afford to loose this project.

Please consider my full support for this project and the adequacy of the DEIR for this project. Should you have any question, please do not hesitate to reach out to me.

Respectfully,

Dennis H
Dear Supervisor Stefani and San Francisco Planning Commissioners,

I'm writing to you to show my full support of the proposed 3333 California mixed-use residential project. As a Pacific Heights homeowner and parent I welcome this well thought out, and beautiful addition to our neighborhood.

Our family often walks to the Presidio, Fillmore Street, Sacramento Street, and Laurel Village, frequenting the various merchants and restaurants. We would welcome new stores, especially the proposed smaller non-traditional "big box" variety and love to walk to brunch (not an option in Laurel Village besides Noah's) and dinner as family on Sunday evening somewhere close by. Our children will be attending the neighborhood Presidio Hill School starting in the Fall of 2019. We plan to walk there and back, and I can see us walking through the 3333 California walkways and open spaces then.

We also support the much needed additional housing units. As an urban San Francisco family, we want a more diverse and inclusive neighborhood.

Thank you for your support and dedication to making our neighborhood and life in San Francisco safer, greener, and more inviting!

Best regards,
Martine Krumholz
2919 Jackson Street
San Francisco, CA 94115
martinek2@hotmail.com
Dear Supervisor Stefani,

My name is David Levine and I live on the 3200 block of Washington. I would like you to know I am a neighbor who would love to see more high quality, well designed, family housing in our neighborhood. 3333 California appears to be just that. The planned open space, low-density design works well with the aesthetic of our neighborhood. The unit mix will attract and retain more families in San Francisco.

We are facing a housing crisis and this proposed community will add much needed supply. We are losing too many families because there are simply not enough housing options. I hope you can find a way to make 3333 California a reality. Thank you.

If there is anything I can do as a concerned San Francisco Resident and neighbor to this project, please do not hesitate to let me know what that is.

Thank you.
May 14, 2019

Dear Supervisor Stefani and San Francisco Planning Commissioners,

I am writing to you to show my full support of the proposed 3333 California Street mixed-use residential project. As a neighborhood resident, I welcome this addition to the neighborhood.

The plan and design put forth by the developer (Prado Group and SKS) is thoughtful, thorough, environmentally conscious, and inclusive. The developer’s plan for 3333 California would turn an under-utilized piece of property into an area accessible to the community, providing much needed housing and businesses to this family-oriented and transit-friendly neighborhood.

As we have seen many young families move outside the City (to Marin, East Bay, and the Peninsula), the 3333 California project will help more people remain in this great city and bring new homes to San Francisco’s west side, where has seen very little development in the last few decades.

The project as outlined by Prado Group and SKS deserves all of our support, and I urge you to help push this project forward to approval so that the residents of San Francisco have access to quality housing, green space, and community.

Sincerely,

Daniel S. Mason
2304 Vallejo Street
San Francisco 94123
415.407.7796
Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing—a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of the neighborhood, I've seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco’s west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Anna Morfit
3660 Jackson Street
San Francisco, CA 94118
annamorfit@gmail.com
Dear Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

The development at 3333 California would create 558 or 744 units, allowing more people to remain in the city and bringing new homes to San Francisco’s west side. Additionally, the proposed development will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco. The proposed pedestrian walkways through the site will connect neighbors in the Laurel Village and surrounding neighborhoods by reimagining the currently walled-off space on the UCSF campus. And with most units designed for two or more bedrooms, the project will be a fantastic place to raise a family and a great amenity for existing residents and neighbors.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

David Lawrence Morse
Dear Supervisor Stefani and SF Planning Commissioners,

I am writing to express my complete support for the proposed development at 3333 California Street. As a current resident of the neighborhood, I was interested to review the project upon hearing of the idea; and I couldn’t be more impressed with their well thought out, respectful proposal.

Housing is a constant concern within our city and this proposal would immediately address the matter for current/future residents of the area by producing 500+ homes. The project exhibits tremendous respect for the area by proposing a sustainable minded building approach, while “blending into” the neighborhood through community designed tactics; including much needed child care space. My favorite component of the proposal is how it would improve our beautiful community by developing “green area” that includes additional trees, gardens, open space and a public green park. These types of improvements will maintain our neighborhood look and feel while adding innovation to the vicinity.

Finally, please find a PDF copy of this letter attached. I appreciate your time and urge you to strongly consider this special proposal.

Best,

Tyler Norsworthy
Dear Supervisor Stefani and SF Planning Commissioners,

I am writing to express my complete support for the proposed development at 3333 California Street. As a current resident of the neighborhood I was interested to review the project upon hearing of the idea; and I couldn’t be more impressed with their well thought out, respectful proposal.

Housing is a constant concern within our city and this proposal would immediately address the matter for current/future residents of the area by producing 500+ homes. The project exhibits tremendous respect for the area by proposing a sustainable minded building approach, while “blending into” the neighborhood through community designed tactics; including much needed child care space. My favorite component of the proposal is how it would improve our beautiful community by developing “green area” that includes additional trees, gardens, open space and a public green park. These types of improvements will maintain our neighborhood look and feel while adding innovation to the vicinity.

I appreciate your time and urge you to strongly consider this special proposal.

Sincerely,

Tyler Norsworthy

4/29/19
Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing—a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of the neighborhood, I’ve seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco’s west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Marie Que
Dear Supervisor Stefani and Honorable Members of the San Francisco Planning Commission:

I have lived in District 2 going on 78 years, as did my parents, both sets of grandparents and all of my aunts and uncles, all of whom ran successful business in San Francisco. That is why I am writing to all of you to lend my support to the proposed development of 3333 California Street, which is a well thought out development, which will bring housing and open space to the Laurel Heights area, not to mention the increased tax revenue to the City and County through not only property taxes, but also increased spending at Laurel Village businesses.

I urge you all to support this thoughtfully developed project, which will permit families to stay in San Francisco and which will ensure that our lovely City continues to thrive.

Respectfully yours,

Francis O. Scarpulla
Dear Supervisor Stefani:

I support the proposed development at 3333 California Street. This project has been thoughtfully developed with input from the community, and marks a critical step forward in addressing San Francisco’s housing crisis. Additionally, the proposal will connect the existing site to the greater Laurel Heights community, creating open spaces, community amenities, and homes.

The project has prioritized community input on design and use from the start. Throughout the design process, the developer held over 125 community meetings, engaged with community groups, and collaborated with two design-focused community advisory groups. These community leaders all provided helpful suggestions that will improve the project and enhance the neighborhood while providing much needed new housing.

Based on community feedback, the development team changed the design multiple times to continue to improve the project. With most units designed for two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

The project includes retail space in the hopes of reducing the need to drive outside of the neighborhood. The proposed retail will be designed to fill-in where goods and services are lacking, complementing the existing retail establishments and helping to stitch the neighborhood together. After collaboration with stakeholders, the designs were updated to fit with the neighborhood’s ‘classic San Francisco’ feel so that the development fits into the neighborhood’s character. Additionally, to keep the Laurel Heights community family-friendly, the project includes a mix of apartments and townhomes.

Having lived in the area for over 30 years, I look forward to this project contributing to the character of the neighborhood while also creating much needed new housing opportunities.
Sincerely,

Karen Mondon Scarpulla

--

KAREN MONDON SCARPULLA, E.A.
T. 415.751.6164 F. 415.751.0889 C. 415.509.1846
3708 Clay St | San Francisco, CA | 94118
Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing—a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtimeresident of the neighborhood, I’ve seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco’s west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,
Kristina Scarpulla

--
Best regards,
Kristina Octaviano
Dear Supervisor Stefani,

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco’s housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a native San Franciscan and life-long resident of the neighborhood, I’ve seen neighbors, friends and family move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco’s west side, where very little new housing has been built over the past 40 years.

Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walk-able retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

Furthermore, the site’s transit-rich location will give the new residents access to five different bus lines within walking distance. If the city wants to encourage people to drive less, to both lessen traffic and protect the environment, then projects in transit-rich locations like this need to be built.

San Francisco is an innovative city that values inclusion, diversity, and community. The people opposing this project value preserving the imputed equity of their homes and their views more than ensuring that San Francisco remains an inclusive, diverse community for all income classes.

Please, in this moment of crisis, I hope that you will support this project and ensure that the residents of San Francisco have access to housing, instead of a small group of privileged homeowners with a view they don't want blocked.

Sincerely,
Catherine,

It was great seeing you with your neighbor, Olivia, a couple of weeks ago, your block looks more amazing every day.

Please see our support letter for 3333 California. We are supporting the proposed development because it will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco.

we hope that this finds you well.

my best, always,

js

jeff schlarb  I principal.designer
M. 415.336.3550
T. 415.295.4567
www.jeffschlarb.com

3525 Sacramento St.
san francisco, ca  94118
Dear Supervisor Catherine Stefani and Planning Commissioners:

My name is Jeff Schlarb and I have been a resident and small business owner in San Francisco for nearly 20 years. I am writing to express my support for the proposed development at 3333 California Street. I have met with a few of the project managers and developers of this project and I strongly believe this project marks a critical step forward in addressing San Francisco’s housing crisis. The development at 3333 California would create 558 or 744 units, allowing more people to remain in the city and bringing new homes to San Francisco’s west side. Additionally, the proposed development will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco. Furthermore, it will create an environment for employees that work in the neighborhood to frequent and enjoy.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project and bring new homes to San Francisco’s west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods. San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

The development at 3333 has the support of my family, as well as my business Green Couch Staging and Design Inc. which has seen first-hand the impact the housing crisis has had on my employees.

Sincerely,

Jeff Schlarb
Dear Supervisors and/or Planning Commissioners:

Building more housing in San Francisco is essential to creating a more equitable and vibrant city. New housing in San Francisco must also be sustainable. The 3333 California development in Laurel Heights is not only adding more housing—it’s adding sustainable housing. That’s why, as a 5th generation San Franciscan and proud Jordan Park neighborhood resident, I support 3333 California.

The 3333 California development team intends to meet or exceed the requirements of the San Francisco Green Building Ordinance by achieving a minimum of LEED Gold for Neighborhood Development Plan certification. The project will also serve as a net positive development for the community and the environment, exceeding code requirements for energy and water. 3333 California also adds density in a smart way. When our cities increase density with in-fill development, we reduce greenhouse gas emissions, and people utilize public transit more. Dense urban environments make a positive impact on community wellness, material and waste management, and our urban ecosystems.

3333 California will be constructed using natural, top-quality materials without sacrificing important view corridors. Efficient and renewable energy systems and waste management will minimize the project’s carbon footprint, and the use of green roofs, storm-water capture, and solar panels will improve the eco-friendliness of 3333 California.

The development provides unprecedented sustainability features without compromising San Francisco’s natural beauty. Landscaping throughout the site celebrates California’s indigenous biodiversity, inspired by a Cypress grove, flowering gardens, a verdant ravine, Oak trees, Walnut trees, Redwood trees and other old-growth trees. A large green park is perched on the southwest corner of the site above the neighborhood to take in scenic vistas, including the Golden Gate Bridge and downtown city views.

3333 California isn’t simply just providing 15 new residential buildings with 744 new homes. It’s an asset uplifting our community’s health today and into the future. I hope you support this critical project.

Sincerely,

Frances Stark

San Francisco
Hi, everyone! As a SF resident who lives in D2 by Fort Mason, I wanted to voice my support for 3333 California Street.

The proposed 3333 California mixed-use development in Laurel Heights answers the city’s housing needs by providing 744 new housing units. These units aren’t just studios—approx. 58% of total homes are family friendly: two, three, and four-bedroom homes.

The City has set an important goal of producing 5,000 new housing units annually for the next 20-years. The 3333 California project alone can help the city meet almost 20% of that important annual goal.

The 3333 California project has been guided by strong public policy and is balanced by community input. Throughout the development process, the Prado Group held over one hundred and sixty community meetings, engaged with the community, city leaders, and collaborated with two design-focused community advisory groups. These community leaders all provided helpful suggestions that will improve the project and enhance the neighborhood while providing much needed new housing.

Based on Community and District Supervisor’s feedback, the development team changed the design multiple times and has now added 186 new, on-site affordable housing units, a quarter of all the project’s housing, for low-income seniors. In the long term, 3333 California represents the types of solutions our city needs. In the short term, it’s an opportunity for more families to stay and thrive in our incredible city. I urge you to support this project.

Thanks,

Zachary

--
Zachary Thomas
https://www.linkedin.com/in/thomaszi | zthomas.nc@gmail.com
Learn something new everyday! >> https://www.khanacademy.org/a/x5gd
August 15, 2019

Kei Zushi, Senior Environmental Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Re: Independent Peer Review of 3333 California – Proposed Alternative
Planning Department Case No. 2015-014028ENV

Dear Mr. Zushi,

You have requested that the Department of Public Works, Bureau of Architecture review and evaluate information provided by the Prado Group and SKS (hereafter referred to as the “project sponsor”), the project sponsor of the 3333 California Street project, Planning Department Case No. 2015-014028ENV, regarding the “Community alternative” submitted by the Laurel Heights Improvement Association (LHIA) in response to the Draft Environmental Impact Report (Draft EIR) prepared for the project. We have completed our review and evaluation, and are pleased to submit this report.

In this report, “proposed project” refers to the project proposed by the developer as represented by the “Planning Application Re-Submittal-1,” dated February 22, 2019 and the “Community alternative” refers to the proposed alternative project submitted by LHIA on January 8, 2019. The Community alternative is described in the document entitled “Community Full Preservation Alternative Overview.”

Contained herein is background information, an analysis of the April 2, 2019 letter from Don Bragg to Kei Zushi, regarding “Response to Request for Information regarding 3333 California;” a description of the key findings; and a list of documents reviewed. This report is based on the Public Works staff’s knowledge and professional judgement in the standard practice of the architectural and construction industries; the City’s permitting process and requirements; and applicable codes, regulations, and ordinances.

BACKGROUND AND EXISTING CONDITIONS

The Planning Department is reviewing and responding to public comments submitted on the Draft Environmental Impact Report (DEIR) prepared for the 3333 California Street Mixed-Use Project. As part of the process, staff is responding to comments from LHIA. In a letter dated March 20, 2019, the Planning Department requested information from the sponsor to help the department evaluate the Community alternative with respect to the characteristics of the project site, methods and practice of construction, and physical feasibility. The department received additional information from the sponsor on April 2,
2019. Planning staff has requested that the Bureau of Architecture at Public Works conduct an independent review of the sponsor’s evaluation of the LHIA Community alternative.

The subject lot is bounded by California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street and has the address 3333 California Street. The lot contains the existing 455,000 square foot (sf) “main building”, which is a 4-story office building with a three-story partial basement built in 1954, and subsequent additions. There is also a small annex building located at the northwest corner of the lot, at California and Laurel streets. The site is sloped and features asphalt parking lots on the west and north sides, brick landscape walls, a concrete trellis at the entry court, concrete paving, a large expanse of lawn on the south side at Euclid Avenue, and numerous trees and shrubs primarily on the east and south edges of the existing main building, as the site slopes down to Presidio and Masonic avenues.

The property is considered a historic resource for the purpose of environmental review because it is listed on the California Register of Historical Resources.

**SUMMARY OF PROPOSED PROJECT**

The proposed project would modify the main building by (1) removing the lower projecting wings, (2) rebuilding the 4th floor, (3) adding a 5th, 6th and partial 7th floors, and (4) renovating all interiors and the entire exterior envelope as required for the new residential use. The proposed project includes removing 217,205 sf of the existing main building and adding 83,607 sf, for a new total area of 321,402 sf in what the proposed project calls Center Building A and Center Building B. The proposed project would remove the annex building (also referred to as the service building in some of the documentation) located at the northwest corner of the site, and all of the site’s landscaping except for 10 existing mature trees.\(^1\)

The proposed project would construct 13 new buildings, including seven duplexes along Laurel Street, and adaptive reuse of the existing main building, which would be divided into two separate residential buildings. New underground garages would be built below seven of the new buildings. All underground garages except the Laurel duplexes would be interconnected with below-grade access tunnels, thus reducing the number of vehicular access points. Plaza Building A and Plaza Building B, along California Street, would include residential and retail uses, and the Walnut Building (along California Street and the extension of Walnut Avenue), would include retail, office and childcare uses. Center Buildings A and B, and the Masonic, Euclid, Mayfair, and Laurel duplex buildings would include residential uses only.

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\(^1\) Two of the retained trees appear to be Monterey Cypress trees located in the proposed Cypress Square, which LHIA claims have existed since the site was used as the Laurel Hill Cemetery based upon Figure 5 found in Exhibit 3 to LHIA’s January 8, 2019 letter addressing project alternatives. The Historic Resource Evaluation – Part I, prepared by Michael Hibma with LSA dated December 2017, states that several large onsite Monterey Cypress trees are likely remnant trees from the Lone Mountain/Laurel Hill Cemetery (see pp. 9, 23, and 27 of the Historic Resources Evaluation – Part I).
A variant is also proposed that would differ from the proposed project only in the development of the Walnut Building. Under the variant, the Walnut building would be approximately 67 feet in height, and in total, the variant would provide up to 744 residential units and no office uses.

Plans provided for the proposed project have a sufficient level of architectural information to convey size, areas, and arrangement of uses and to demonstrate substantial compliance with Planning Code requirements and basic life-safety code requirements. Where our analysis leads to a conclusion not specifically stated in the project sponsor’s response dated April 2, 2019, the phrase “based on Public Works analysis” is used.

SUMMARY OF LHIA’S “COMMUNITY ALTERNATIVE”

The LHIA Community alternative would keep most of the existing office building and convert it to residential use. The Community alternative would also demolish the circular speed ramps to the existing parking garage; but does not describe how cars can access the proposed basement parking without these ramps. Although not disclosed in the comment, the Community alternative would also likely require the demolition of approximately 50 feet of the northern portion of the three stories of partial basement parking, due to the placement of the proposed Walnut Building, which is proposed to be located very close to the existing main building’s northern wing. This analysis is based on comparison of the Community alternative “Site Plan”, the aerial photographs in Exhibit 3, and drawing C2.01 “Existing and Proposed Building Overlay” from the proposed project.

The Community alternative proposes to retain all the site and landscaping work on the south side of the site, including the primary brick landscape walls, the entry court on the west side including concrete trellis, the lawn areas, and much of the landscaping on the south side that has been added over the years as part the Fireman’s Fund office building according to the series of aerial photographs in Exhibit 3. It appears that all six of the large trees in the East and West parking lots noted on page 2 of Exhibit 3 would be removed as part of the Community alternative to make way for proposed new residential construction, even though LHIA states that California Back Building would be sculpted around the large Monterey Cypress trees (see p.7 of Appendix A of LHIA’s January 8, 2019 letter). Denise Bradley Cultural Landscapes states that these trees appear to have been part of the Laurel Hill Cemetery. These six trees are referred to in the Exhibit 3 as #24, #25, #118, #119, #120 and #121.

The Community alternative would demolish the annex building located at the northwest corner of the site, and construct four new buildings. These four buildings include a new Mayfair building very similar to the proposed project but without the below grade parking, a California Front Building, a California

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2 Exhibit 3 in this memo refers to Exhibit 3 (April 24, 2018 letter from Denise Bradley Cultural Landscapes to Kathy Devincenzi, Location of Trees that were part of the Laurel Hill Cemetery) to LHIA’s January 8, 2019 letter, unless otherwise noted.

3 Appendix A in this memo refers to Appendix A (Community Full Preservation Alternative Overview) of LHIA’s January 8, 2019 letter, unless otherwise noted.

4 LHIA states that the California Front Building would include 14 new buildings containing 56 units for middle-income families. In contrast, LHIA does not specifically provide the number of buildings that would be included in the
Back Building over a 1-story basement garage, and a Walnut building over a 1-story basement garage. All new buildings would include residential uses only.

LHIA’s January 8, 2019 letter includes the “Site Plan” and the “Circulation Plan” which are diagrammatic plan views of the site, and the text-based document, “Appendix A: Community Full Preservation Alternate Overview.” These documents do not have a sufficient level of architectural information (e.g., a scaled site plan showing the dimensions of the subject lot and buildings, landscaped areas, and setbacks, floor plans, roof plans, sections and elevations) to convey size, area, arrangement of uses or to demonstrate compliance with Planning Code requirements and basic life-safety code requirements.

**METHODOLOGY, ASSUMPTIONS, AND DEFINITIONS**

- Within this document we use the term *residential* to mean multi-family residential buildings that have more than two units or are otherwise required to be designed to the California Building Code (which applies to buildings with two or more residential units) and not the Residential Code (which applies to single-family homes). Public Work’s analysis is based on the proposed project and the Community alternative would both be required to comply with the California Building Code.

- For measurement of areas at each floor level, we use the following terms which may differ from how the terms are used by Planning Code, Building Code, or by the Building Owners and Managers Association (“BOMA”):
  - **Gross Area** is measured at the exterior face of exterior wall such as the exterior face of window wall or exterior face of cladding. Gross area includes structure and all vertical penetrations such as shafts. This gross area also represents the footprint of the building.
  - **Usable Area** is measured to the exterior walls enclosing occupiable spaces and excludes vertical shafts, stairs, and elevators.
  - **Net Area** is measured to the interior wall of the enclosing occupiable spaces and includes all areas within this perimeter other than common shafts, stairs or elevators already deducted above. The net areas is the saleable or leasable area.

- To calculate the number and size of units based upon the available footprint, our analysis uses standard metrics such as sizes of typical components such as units, corridors, and parking stalls. These components are arranged into common configurations as much as possible to maximize efficiency. Typical sizes and configurations of these components are not published standards but are developed by each professional through experience. We use the term *layout study* to describe the architectural process of arranging components into acceptable configurations for the purposes of determining best approaches to solving particular problems.

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California Back Building, but states that each building would be approximately 28.5 feet wide. (See Appendix A of LHIA’s January 8, 2019 Letter).
The term **efficiency** is used herein, and frequently by the project sponsor in their review of the Community alternative. With regard to residential spaces, efficiency is the percentage of usable area to the gross area of a space or building. Typically, multi-family building designers use the term efficiency to describe the percentage of the building that can be marketed, leased and sold as residential units. The project sponsor states that they expect most residential projects to have efficiencies of 70% to 74%. Based on our experience in large multi-family residential and mixed-use projects, we agree with the project sponsor and refer herein to the buildings within the Community alternative as “efficient” or “inefficient” by comparison to the target 70% to 74% efficiency.

Building areas can be measured in different ways and there are different methods for measurement depending on the different purposes. For example, areas are calculated differently to demonstrate compliance with planning codes, to demonstrate compliance with building codes, to record a deed for condo maps, or to establish areas for commercial leases. While BOMA published a standard for measuring areas of multi-family residential projects in 2010, most developers and architects have had their own methods for many years. We consider it best practice to define the method used for each project’s documentation.

For projects at an early conceptual level where only block diagrams are used, such as the Community alternative, estimates of the overall footprint of the building is the only measurable area. Without additional floor plans that show and dimension units, corridors, structure, mechanical shafts, etc., efficiency percentages are the only means available to calculate the approximate amount of residential area.

Once floor plans are complete to the point of showing all rooms, corridors, structure, mechanical shafts, etc., it is possible to tabulate usable area, which excludes vertical shafts, stairs, and elevators. The usable area is very close to the actual net space within one residential unit that is marketed and sold or leased.

- The project sponsor also uses the term **efficiency** with regard to parking. The project sponsor states, “In the context of parking, efficiency is the total gross area of parking facility divided by the number of parking spaces.” We agree with this definition and the project sponsor’s consideration of 300-325 square feet per stall as a theoretical maximum rate of efficiency, with 400-500 square feet per stall as more typical for underground parking in mixed-use projects, where structural columns and layouts are compromised to meet the needs of residential or retail uses above in addition to cars.

- The term **junior 1-bedroom** is a bedroom configured to allow the bedroom to have access to light and air through the living area. The bedroom has its own space but must be substantially open to the living area to meet code requirements. Junior 1-bedrooms are smaller than 1-bedroom units.
• The term **studio** combines the sleeping areas with the living areas within one room. Studios are smaller than junior 1-bedrooms.

• The term **double-loaded corridor** describes an arrangement of units along both sides of a linear corridor. This arrangement is the most efficient and allows for a minimum number of stairs and elevators. A **single-loaded corridor** arrangement has units along only one side of a linear corridor and is typically less efficient because only one side of the building has access to required light and air. Single-loaded and double-loaded can also be used to describe arrangement of parking stalls along drive aisles.

• **Flats** are units that are stacked in a vertical arrangement with all access provided vertically via stairs and elevators; there are no corridors in flats.

• The term **window wall** is used to describe exterior fenestration, or windows, that are supported by the floor level slab below and the next floor level slab above. Window walls typically occur in continuous sequence such as on all four sides of a building. This term is used by TreanorHL in Exhibit 1,\(^5\) to describe the existing fenestration system at the existing main building.

• For purposes of this analysis, we assume standard 12-foot planning modules for widths of living rooms and bedrooms. For example, a studio would be 12 feet wide (combined sleeping and living room), a 1-bedroom would be 24 feet wide (living room and bedroom), and a 2-bedroom would be 36 feet wide (living room plus 2 bedrooms). Room widths as narrow as 10 feet are acceptable only for projects focused on small units for second or third bedrooms, and will typically only be used for a small percentage of units in a building. Larger widths are typically less efficient and can result in larger units but without a commensurate increase in the number of bedrooms. This is because to comply with the Building Code, all habitable spaces such as living rooms and bedrooms require access to light and air (e.g., a window). Rooms that do not have required access to light and air could be used for other non-habitable rooms such as bathrooms, closets, or kitchens. The term **habitable** is defined by the Building Code.

• For purposes of this analysis, we assume standard unit depths of 30 to 35 feet. Deeper units are typically less efficient, as there would be less window area available for bedrooms given the same unit area. We agree with the project sponsor’s assumption of average unit sizes: 1-bedrooms of 750 square feet, 2-bedrooms of 1,100 square feet, and 3-bedrooms of 1,350 square feet.

• The project sponsor states that the Community alternative plan for the existing main building would result in the majority of units that range from 16 feet wide by 50 feet deep to 13 feet

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\(^5\) Exhibit 1 in this memo refers to Exhibit 1 (January 7, 2019 memo prepared by Nancy Goldenberg with TreanorHL) to LHIA’s January 8, 2019 letter, unless otherwise noted.
wide by 61 feet deep. We agree that such unit configurations are undesirable as they will be long and deep studios or junior 1-bedroom units.

ANALYSIS OF PROJECT SPONSOR’S RESPONSE TO REQUEST FOR INFORMATION REGARDING 3333 CALIFORNIA STREET

This section is an analysis of the project sponsor’s response to the Planning Department’s request for information to evaluate the Community alternative as contained in the April 2, 2019 letter prepared by Don Bragg, Senior Vice President of the Prado Group. The numbered items correspond to the project sponsor’s numbering of their responses. We have summarized the question in bold text followed by our analysis.

1. Is it possible to determine the LHIA Community alternative’s dwelling unit mix and unit sizes by type for each proposed structure? If so, calculate this information and state assumptions and sources used.

a. The project sponsor analyzes the five main building groups in the Community alternative: California Front and Back Buildings, Walnut Building, Mayfair Building and the existing main building. The project sponsor states that the Community alternative could provide 492 units, not the 558 units stated in the comment letter. In a follow-up email dated April 4, 2019, the project sponsor revised this total number to 470 units. Based on Public Works analysis, we estimate that 473 units could be built in the Community alternative scheme. The Table 1 below compares the number of units in the Community alternative that LHIA claims it could provide, with the project sponsor’s and Public Works’ analysis of what the Community alternative could provide:

<table>
<thead>
<tr>
<th>BLDGS IN COMMUNITY ALTERNATIVE</th>
<th>LHIA’S DESCRIPTION OF COMMUNITY ALTERNATIVE</th>
<th>SPONSOR’S REVIEW OF LHIA ALTERNATIVE</th>
<th>PUBLIC WORKS ESTIMATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXISTING MAIN BUILDING</td>
<td>292</td>
<td>231</td>
<td>226</td>
</tr>
<tr>
<td>CALIFORNIA FRONT</td>
<td>56</td>
<td>56</td>
<td>56</td>
</tr>
<tr>
<td>CALIFORNIA BACK</td>
<td>56</td>
<td>40</td>
<td>40</td>
</tr>
<tr>
<td>WALNUT</td>
<td>118</td>
<td>107</td>
<td>115</td>
</tr>
<tr>
<td>MAYFAIR</td>
<td>36</td>
<td>36</td>
<td>36</td>
</tr>
<tr>
<td>TOTAL</td>
<td>558</td>
<td>470</td>
<td>473</td>
</tr>
</tbody>
</table>

b. At the existing main building, the Community alternative would keep all areas of the building above grade that are usable for residential uses. LHIA does not state how much area of this building would be used, but proposes 292 units at an average of 798 square feet each, resulting in 233,016 square feet of residential area. It is unclear if this is gross or net residential area. In contrast, the project sponsor states that only 231 units are possible due to there being 263,500
sf of gross residential square feet available and 184,450 net residential square feet, or (263,500 x70% / 798 = 231).

c. In the existing building, we agree with project sponsor’s conclusion that the width of the existing building, shown at 144’-8” wide in the proposed project drawings, would create inefficient units. Based upon the Community alternative diagrams and Appendix A description, there would be one residential unit at each side with a light court and two single-loaded corridors in the middle. 798 square foot units at 50-feet deep would result in 16-foot-wide units (798/50 = 15.96). Such narrow units will be restricted to studios or junior 1-bedroom units since there is space for only one room to face the glass (providing required access to light and air). Given the size of the building, this means that the Community alternative would have at least 75% of the project’s total units as large studios and junior 1-bedroom units.

d. Public Works has analyzed the computer-aided drawing (CAD) files of the existing building contained in the file “Building Plans_2017-0726 BDC Areas.dwg.” For the existing building, we have determined there is a total of 458,292 gross area of the building, of which after subtracting 130,578 sf for parking; 4,112 sf for the auditorium; 11,500 sf for childcare (stated by LHIA but not shown in CAD); and 1,183 SF for café (stated by LHIA but not shown in CAD), there is a total of 271,154 SF area for residential area.

e. Of this 271,154 SF, we subtract 91,090 SF that would be required for corridors or are otherwise unfit for use within residential units. We assumed 6-foot-wide corridors, wider than the typical 5-foot-wide corridors due to the unusually long corridors since some corridors are over 300 feet long. We also deducted areas that are over 50 feet from exterior windows as we consider that space to be unusable within units because they would be too remote from bedrooms or living areas that must have access to light and ventilation per the Building Code. These areas could be amenity spaces such as storage, bike storage, meeting rooms or other communal spaces that do not need windows. As an example, half of the perimeter of Level 1 and twenty percent of the perimeter of Level 2 are below grade, cannot accommodate windows unless large lightwells are created, and are thus unsuitable for residential units.

f. Based on our calculations, if the units averaged 798 sf (as proposed in the Community alternative), the remaining 180,064 square feet could accommodate 226 units. This 798-sf unit is usable area.

g. We agree with project sponsor’s and LHIA’s analysis that the California Front Buildings, composed of fourteen 28.5’ by 75’ four-story buildings, can accommodate 56 units (with four units (flats) in each of the 14 buildings). We also support the project sponsor’s conclusion that these units would be less than the 85% efficiency assumed in LHIA numbers (1,821 SF unit/2,137.5 SF footprint = 85%). An efficiency percentage of 85% is unusually high, and not reasonable. The arrangement of having one elevator, two stairs, corridor, and mechanical shafts within each 28.5’ by 75’ building (in order to include “direct access” to the parking garage and meet the building code’s egress and accessibility requirements) would reduce efficiency below the stated 85% to approximately 65%. At approximately 2,000 square feet, the units would be large enough to fit a mix of 2-bedroom and 3-bedroom units.

h. For the California Back Buildings, we agree with the project sponsor’s conclusion that the 40-foot-deep units are not buildable. Based on Public Work’s layout studies, the arrangement of
having one elevator, two stairs, a short corridor and mechanical shafts within each 28.5’ by 40’ building, would reduce efficiency to 42%. The resulting unit size would average 425 square feet. There are no dimensioned site plans to confirm how many 40-foot deep units would be provided, but upon review of the TreanorHL “Site Diagram”, and the figures within the memorandum from Denise Bradley Cultural Landscapes (Exhibit 3), we believe the loss of sixteen units to be a reasonable estimate based on the trees’ impact to four of the 28.5-foot-wide buildings.

i. The project sponsor states that to stay within the 40-foot height limit, the California Back Building would be built at the height of the rear yard of the California Front Building. The massing for the Back Building could still work, but would require the “rear yards” of the Front Buildings to be considered as mostly common open space – not “private” as described in comment - in order to access the Back Buildings through the Front Buildings’ “rear yards” (otherwise the first- and second-floor units in the Back Building must be accessed from the south side of the Back Building and this would require a greater amount of excavation). Therefore, Public Works agrees with the project sponsor’s conclusion that this is an issue not addressed in the Community alternative.

j. For the Walnut Building, the project sponsor concludes that only 3-1/2 stories could be built to stay within a 40-foot height limit. Public Works believes that the ‘E’ configuration of the building footprint will allow for the Walnut Building to have double-loaded corridors with the units on the south side facing inwards towards the courts. Only some of the units on the lowest level of the west side would be buried below grade. Therefore, Public Works believes that only 3 units would be lost, so that 115 units could be provided.

k. We agree with the project sponsor and LHIA that the Mayfair Building, which is very similar to the proposed project’s Mayfair building, can achieve 36 units. In both projects this is a small residential building using a conventional layout with an elevator and two stairs with units arranged along a double loaded corridor. However, in the Community alternative version, the parking would be in the garage below the adjacent California Front and Back Buildings, which would preclude the “direct access” described in the LHIA comment. By “directly accessed,” Public Works expects the parking to be within the same building.

l. In summary, based on our analysis, and our review of the project sponsor’s assessment, we believe the Community alternative could provide a maximum of 473 units: 115 units in the Walnut Building, 56 units in the California Front Building; 40 units in the California Back Building, 36 units in the Mayfair Building, and 226 units in the existing building.

m. The average unit sizes are less than 900 sf in the Walnut Building, and less than 800 sf in the existing main building. Thus, these buildings would have mostly junior 1-bedroom and 1-bedroom units as noted in the table below. Planning Code section 207.7 requires projects to provide a minimum of 25% 2-bedroom units and a minimum of 10% 3-bedroom units. The Community alternative would be required to provide fewer total units in order to meet this required unit mix. We agree with the project sponsor’s estimated unit mix that the Community alternative could provide, as shown in Table 2 below.
n. Based upon the above analysis, we agree with the project sponsor’s conclusion that the community alternative would not support 558 units, nor would it comply with the unit mix requirements of Planning Code Section 207.7.

2. The Community alternative describes site circulation and access points for single-level, underground parking garages with 460 on-site spaces. Please confirm constraints or conditions would allow development of the access points, 460 on-site parking spaces, passenger and commercial loading as shown in the attached Circulation Plan.

a. The Community alternative proposes to re-use the existing garage below the existing main building and to provide a one-level below grade parking garage below the Walnut and California Front and Back Buildings, for a total of 460 spaces. In the table below we have summarized the car parking stalls in the Community alternative, the project sponsor’s review of the Community alternative, and an estimate based on Public Work's analysis. The following is the Public Works analysis.

<table>
<thead>
<tr>
<th>TABLE 2: UNIT MIX</th>
</tr>
</thead>
<tbody>
<tr>
<td>UNIT TYPE</td>
</tr>
<tr>
<td>Studio or Jr 1-Bedroom</td>
</tr>
<tr>
<td>1-Bedroom</td>
</tr>
<tr>
<td>2-Bedroom</td>
</tr>
<tr>
<td>3-Bedroom</td>
</tr>
<tr>
<td>TOTAL</td>
</tr>
</tbody>
</table>

b. The project sponsor states that the one-level below grade parking garage underneath the Walnut Building and California Front and Back Buildings would have a gross area of approximately 110,000 gross square feet (65,000 + 45,000). This is gross area, inclusive of structural components, mechanical equipment, drive aisles for circulation, etc. The project
sponsor states that the inefficiencies of having an elevator and stairway for each of the 28 buildings at the California Front and Back building would result in an inefficient garage and estimates that 600 SF per stall is appropriate, which would result in 183 stalls (110,000/600=183 stalls). The project sponsor states an average efficiency of 425 square feet per stall could be used if the design were changed to provide centralized stairs and elevators, resulting in 258 stalls (110,000/425=258). However, Table 3 above includes the 183 stalls based on the configuration LHIA describes for the Community alternative on page 7 of Appendix A with a total of 28 buildings with direct access from each building to the basement level garage.

c. Public Works has analyzed the Walnut Building and California Front and Back Buildings separately due to the complexity of the arrangement of elevators and stairs at the California Buildings. Based on Public Work’s analysis, the one-level below grade parking garage underneath the California Front and Back Buildings would have a gross area of 63,840 gross square feet (160’-0” x 28’-6” x 14) (compared to the 65,000 sf estimated by the project sponsor). However, the 63,840 gross area needs to be reduced by the narrower depth of 40 foot lots at the California Back buildings since the LHIA states that these lot depths would accommodate existing trees. Therefore, the garage would only able to use the narrower dimensions of 399 feet (28.5’ x 14) and 140 feet, or 55,860 GSF. At 425 sf per stall, this allows of a maximum of 131 stalls.

d. We agree with the project sponsor that, to provide “direct access” the California Front and Back Buildings would require 28 elevators and 28 stairs that reached to the garage level. Each of the 28 buildings would require accessible access via elevator due to the grade change and direct stair access. This is a significant loss of space in which two parking stalls would be likely removed for each of the elevators and stairways for each of the 28 buildings, resulting in a total loss of at least 56 stalls. Therefore, Public Works estimates include 75 stalls as shown in Table 3 above (131-56=75 stalls).

e. The Walnut garage, at approximately 45,000 square feet and 425 square feet per stall, could provide approximately 106 parking stalls.

f. We agree with the project sponsor that the Community alternative would not be able to access most of the existing below-grade garage because the circular access ramps would be removed to build the Walnut Building. The Walnut Building, per the Treanor HL Site Diagram, is shown as being constructed over the area where the circular ramps are and over a portion of the existing garage.

1 The project sponsor concludes that 154 stalls could be retained below the existing main building if internal ramps were constructed displacing 60 stalls. Public Works estimates that a maximum of 142 stalls could be retained based on analysis below.
2 Two minimum 12-foot wide ramps would be required at each level. Due to column layouts, a single aisle of 20 to 24 feet would not fit within the existing column bays.
3 Since the floor to floor height of the existing garage is 10’-6” per the proposed project’s drawing sheets A6.02, A6.03, and A6.04, the ramps with top and bottom landings would be about 126 feet in length. The 126 feet includes two 25-foot landings, two 10-foot transition zones at 1:12.5 slope and a 66-foot sloped ramp at 1:6 slope. To accommodate 2 ramps at each level, there would be a loss of about 72 stalls.
4. Since all existing drive aisles are needed to access parking, any new ramps would displace parking stalls and not access aisles.

5. For this study, Public Works assumes the new ramps would be straight rather than circular since the configuration of the existing garage lends itself to straight ramps. This study did not take into account the requirements for structural modifications to the existing garage to construct the ramps.

g. Based on the above discussion, the Community alternative would not be able to include 460 parking spaces in one level below the California Buildings, the Walnut Building and in the existing garage. Either fewer spaces could be provided or additional levels of parking (requiring additional excavation) would be required.

h. We agree with the project sponsor’s conclusion that due to the sloping site, the garage below the California Front and Back Buildings would effectively require two levels of excavation at this location for one level of parking.

i. We agree with the project sponsor’s assessment that an additional level of below grade parking would be necessary in the Community alternative to provide 460 spaces described in the comment letter. An additional 123 car spaces would be required if using the project sponsor’s estimate of 337 stalls or an additional 137 car spaces would be required if using Public Work’s estimate of 323 stalls.

j. Any additional levels of parking would require additional excavation. As the Community alternative also provides fewer units and smaller units, any additional residential area added to increase the number of units would require additional increases in parking and excavation, if the Community alternative is to achieve the 460 parking stalls as stated on page 3 of Appendix A.

k. With regard to freight loading, we agree with the project sponsor’s conclusion that the Community alternative could not include underground freight loading and unloading accessed off Presidio Avenue using the existing garage openings. The height of the existing opening on Presidio Avenue and the height of the existing parking levels are not tall enough to accommodate freight vehicles. Therefore, we agree with the project sponsor that the Community alternative could not physically include underground freight loading or unloading spaces, as described page 8 of Appendix A.

3. **“What is the anticipated amount of excavation that would be needed to construct the LHIA alternative or variant?”** We estimate that one additional level of parking below the Walnut and California Front and Back Buildings would be required to provide the number of parking spaces referenced in the comment (a total of 460 on-site spaces). Due to the slope of the site as discussed above, this would require two levels of excavation plus foundation depth along California Street, and three levels plus foundation depth in other areas (i.e., on the south of the excavation area along California Street) due to the up-slope of the site.

4. **Pedestrian Pathways:** We agree with the project sponsor’s observation that the Community alternative appears to rely on the few existing pedestrian pathways between the north and south sides of the existing main building to provide for a north-south connection between California Street
and Euclid Avenue. These paths do not appear to be accessible per ADA requirements due to the multiple flights of stairs, in particular the path leading through the existing building along the eastern side.

**ADDITIONAL PUBLIC WORKS ANALYSIS**

This section includes additional information based upon Public Work’s analysis of the Community alternative.

a. The Community alternative does not demonstrate compliance with bulk regulations (Planning Code Section 270), Rear Yard (PC Section 209), open space (PC Section 135), clear area per (PC Section 140), or bicycle parking (PC Section 155). In addition, there is no description of any spaces for trash and recycling access. As noted above, vehicles used for trash and recycling could not be accommodated in the existing garage accessed from Presidio Avenue due to the height of the opening and the height of the levels in the garage.

b. The Community alternative includes retention of the historic landscapes that surround the existing main building on the east, west, and south sides. Without new private yards or decks adjacent to the existing main building, none of the new units at the existing building would have private open space.

d. On page 3 of Appendix A, LHIA states the Community alternative would be built in 3 years with concurrent renovation of the main building and new construction of the Walnut and California Front and Back Buildings. A 3-year construction schedule seems challenging given there would be excavation along the entire California Street frontage; approximately 469,000 gross square feet of new construction including garage at the Walnut and California Front and Back buildings; and 458,000 gross square feet of renovation at the existing building. With excavation, construction and renovation occurring across much of the site at the same time, the only areas suitable for construction staging would be the asphalt parking lot of the Entrance Court unless some of the historic landscaped areas would be used.

b. On page 9 of Appendix A, LHIA describes a variation of the Community alternative we are referring to as the Community alternative variant, or variant. This variant includes 3 additional floors at the Walnut building for a total of 7 stories of residential units. These extra floors would provide 118 additional units and all the units in the building would be reduced from an average of 809 square feet to 732 square feet with 84 studios or junior 1-bedrooms and 134 1-bedroom units. Given the added floors and reduced unit size, the 218 units in the Walnut building, as stated by LHIA, is reasonable and increases public works’ estimated overall unit count 473 (Community alternative) to 576 units (Community alternative variant). The overall project unit mix would change from what is shown in Table 2 (48% Studio, 25% 1-bedroom, 20% 2-bedroom, 7% 3-bedroom) to 54% Studio, 30% 1-bedroom, 11% 2-bedroom, 5% 3-bedroom.

**SUMMARY OF ANALYSIS**

The Community alternative proposes to provide 558 residential units, 460 parking spaces, and required freight loading underground. Public Works agrees with the project sponsor’s conclusions that the Community alternative could not be constructed as proposed to provide 558 residential units and 460
parking spaces, and would not meet the unit mix, bicycle parking, and freight loading/unloading requirements of the Planning Code.

**DOCUMENTS REVIEWED**

We have reviewed the following documentation available as part of the project file:

1. Letter from Don Bragg, Senior Vice President and Director of Development with Prado Group, to Kei Zushi, San Francisco Planning Department, regarding the Response to Request for Information regarding 3333 California Street, dated April 2, 2019.

2. Email from Jing Ng, Development Associate with Prado Group, to 3333 California St Project Team, regarding the Response to Request for Information regarding 3333 California Street, dated April 4, 2019.

3. 3333 California Street Mixed-Use Project EIR (Case No. 2015-014028ENV), Table S.3, Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternatives and Table 2.2, Characteristics of Proposed Buildings on the Project Site.

4. Letter from Kathryn R. Devincenzi, Laurel Heights Neighborhood Association, to Kei Zushi Planning Department, regarding “Draft EIR for 3333 California Street, San Francisco, CA 94118 / Planning Department Case No.: 2015-014028ENV / State Clearinghouse No: 2017092053”, dated January 8, 2019, including the following attachments:
   - Exhibit 1, Report by TREATORHL regarding Secretary of the Interior’s Standards Compliance Evaluation of 3333 California Street, San Francisco, California, dated January 7, 2019.
   - Appendix A, “Community Full Preservation Alternate Overview”, (no date), (no author).
   - Exhibit A, Letter from Julianne Polanco, State Historic Preservation Author, to John Rothman, President, and Kathryn Devincenzi, Vice President, Laurel Heights Improvement Association of San Francisco; dated August 31, 2018.
   - Exhibit B, “Aerial View Looking SE” and “Site Plan”, (prepared by TreamorHL), (no date).
   - Exhibit C, “Circulation Plan”, (prepared by TreamorHL), (no date).
   - Exhibit 2, Letter from Andrew Wolfram, President, Historic Preservation Committee, to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department, dated December 11, 2018.
   - Exhibit 3, Memo from Denise Bradley Cultural Landscapes to Kathryn Devincenzi, Vice President, Laurel Heights Improvement Association of San Francisco, dated 24 April 2018.


8. Autocad file named “Building Plans_2017-0726 BDC Areas.dwg”, dated July 26, 2019. This file has partial floor plans drawn for each level of the existing building with dimensions shown at exterior of the building. The levels included in the file are Third Sub-level, Second Sub-level, First Sub-level, First Level, Second Level, Third Level, Fourth Level, and Fifth Level (Roof). These floor plans include structure, core and exterior elements only and exclude non-structural interior partitions and doors.

AUTHOR

This document has been prepared at the request of the San Francisco Planning Department, based upon review and analysis by the following individuals with San Francisco Public Works:

- Prepared by Vito Vanoni, AIA, Senior Architect and Technical Manager
- Reviewed by Julia Laue, AIA, Principal Architect and Bureau Manager

We are pleased to present this analysis of the sponsor’s analysis of the Community alternative. Please let us know if you have any questions.

Regards,

Vito Vanoni, AIA
Senior Architect & Technical Manager
WHEREAS, Under the California Environmental Quality Act (CEQA) and State of California Water Code (Section 10910(g)(1)), the San Francisco Public Utilities Commission (SFPUC) is required to prepare and approve a Water Supply Assessment (WSA) for the cumulative water demands presented by the proposed 3333 California Street Project, which would redevelop the existing University of California San Francisco (UCSF) Laurel Heights Campus into a mixed-use residential development; and

WHEREAS, This the 3333 California Street Project is required to comply with the City’s Non-potable Water Ordinance, Article 12C of the San Francisco Health Code, and as a result, the Project will offset its potable water use through the use of alternate water sources; and

WHEREAS, A WSA is an informational document that assesses the adequacy of water supplies to serve a proposed project and is required to be prepared as part of the CEQA environmental review process; and

WHEREAS, Approval of a WSA as an informational document is not considered an approval action as defined in Section 15378 of the CEQA Guidelines; and

WHEREAS, A WSA must be approved at a public meeting by the governing body of the public water supplier that would serve the proposed project; and

WHEREAS, On June 13, 2017 by Resolution No. 17-0142, this Commission approved a WSA for the 3333 California Street Project, which concluded that the SFPUC has adequate water supplies to meet the proposed project’s water demands through 2040; and

WHEREAS, Following this Commission’s approval of the WSA, the water demand estimates for the current proposed project are greater than those provided in the WSA approved on June 13, 2017 due to recent changes in the project description; and

WHEREAS, On December 12, 2018, the State Water Resources Control Board adopted an amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (i.e., Bay-Delta Plan Amendment), which, if implemented in the future, would affect the Regional Water System supply and the SFPUC’s ability to meet the projected demands of existing and future retail customers, including the proposed project; and

WHEREAS, Multiple lawsuits are pending challenging the Bay-Delta Plan Amendment, and the City is a party to one of those suits; and

WHEREAS, In accordance with the State Water Resources Control Board’s instruction, on March 1, 2019, the SFPUC, in partnership with other key stakeholders, submitted a proposed “voluntary agreement” (March 1st Proposed Voluntary Agreement) for the State’s consideration as a substitute or replacement of the Bay-Delta Plan Amendment; and
WHEREAS, On March 26, 2019 by Resolution No. 19-0057, this Commission endorsed the SFPUC’s continued participation in the voluntary agreement negotiation process and stated its intent that the terms of any final voluntary agreement would improve the health of the fisheries and maintain the reliability of its water supply including maintenance of its level of service (LOS) goal of no more than 20% system-wide rationing; and

WHEREAS, Because implementation of the Bay-Delta Plan Amendment or an alternative Voluntary Agreement is uncertain at this time, the SFPUC staff prepared the attached Revised WSA for the proposed 3333 California Street Project, analyzing water supply and demand under three scenarios: (1) No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement (“Scenario 1”), (2) Implementation of the March 1st Proposed Voluntary Agreement (“Scenario 2”), and (3) Implementation of the Bay-Delta Plan Amendment (“Scenario 3”); and

WHEREAS, The Revised WSA concludes that the SFPUC’s total projected water supplies through 2040 will (1) meet the demands of the proposed project in normal years under all three scenarios, (2) meet the demands of the proposed project in dry years without rationing beyond the SFPUC’s LOS goal of 20% system-wide rationing under Scenario 1, (3) meet the demands of the proposed project in dry years but require rationing closer to the LOS goal under Scenario 2, and (4) not reliably meet the demands of the proposed project without rationing at a level greater than that required to achieve the LOS goal under Scenario 3; now, therefore, be it

RESOLVED, This Commission approves the Revised Water Supply Assessment for the proposed 3333 California Street Project pursuant to the State of California Water Code Section 10910(g).

I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of June 11, 2019.

[Signature]

Secretary, Public Utilities Commission
May 29, 2019

TO: Commissioner Ann Moller Caen, President
Commissioner Francesca Vietor, Vice President
Commissioner Anson Moran
Commissioner Sophie Maxwell
Commissioner Tim Paulson

THROUGH: Harlan L. Kelly, Jr., General Manager

FROM: Steven R. Ritchie, Assistant General Manager, Water

RE: Revised Water Supply Assessment for the 3333 California Street Project

1.0 Summary

1.1 Introduction

Under the Water Supply Assessment law (Sections 10910 through 10915 of the California Water Code), urban water suppliers like the San Francisco Public Utilities Commission (SFPUC) must furnish a Water Supply Assessment (WSA) to the city or county that has jurisdiction to approve the environmental documentation for certain qualifying projects (as defined in Water Code Section 10912 (a)) subject to the California Environmental Quality Act (CEQA). The WSA process typically relies on information contained in a water supplier's Urban Water Management Plan (UWMP), and involves answering specific questions related to the estimated water demand of the proposed project. This memo serves as the WSA for the proposed 3333 California Street Project (“proposed project”), for use in the preparation of an environmental impact report by the San Francisco Planning Department (case no. 2015.014028ENV, San Francisco Planning Department).

This WSA is a revision to and supersedes the WSA that was previously prepared for the same proposed project dated May 17, 2017 and approved on June 13, 2017 (Resolution No. 17-0142). While the project description has not substantially changed, the WSA was revised to reflect changes to the distribution of residential, retail, child care, and parking uses throughout the site resulting in higher water demands than previously estimated, as well as recent changes to water supply availability under implementation of the Bay-Delta Plan Amendment, described in Section 1.1.2.

1.1.1 2015 Urban Water Management Plan

The SFPUC’s most current UWMP is the UWMP update for 2015, which the Commission adopted in June 2016 (Resolution No. 16-0118). The water demand projections in the UWMP incorporated 2012 Land Use Allocation (LUA 2012) housing and employment growth projections from the San Francisco Planning Department. The water demand projections are presented in five-year increments through 2040, meeting Water Code requirements. Growth associated with the proposed project was encompassed within the LUA 2012, and water demand associated with the proposed project was encompassed within the 2015 UWMP water demand projections.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.
The WSA for a qualifying project within the SFPUC’s retail service area\(^1\) may use information from the UWMP. Therefore, the 2015 UWMP is incorporated via references throughout this WSA shown in bold, italicized text. The UWMP may be accessed at [www.sfwater.org/uwmp](http://www.sfwater.org/uwmp).

### 1.1.2 2018 Bay-Delta Plan Amendment

In December 2018, the State Water Resources Control Board (SWRCB) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The SWRCB is required by law to regularly review this plan. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 40% of the "unimpaired flow\(^2\)" on the three tributaries from February through June in every year type, whether wet, normal, dry, or critically dry.

If the Bay-Delta Plan Amendment is implemented, the SFPUC will be able to meet the projected water demands presented in the 2015 UWMP in normal years but would experience supply shortages in single dry years or multiple dry years. The 2015 UWMP already assumes limited rationing may be needed in multiple dry years to address an anticipated supply shortage by 2040, but implementation of the Bay-Delta Plan Amendment will require rationing in all single dry years and multiple dry years and to a greater degree to address supply shortages not accounted for in the 2015 UWMP.

The SWRCB has stated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by the year 2022, assuming all required approvals are obtained by that time. But implementation of the Plan Amendment is uncertain for several reasons. First, under the Clean Water Act, the United States Environmental Protection Agency (U.S. EPA) must approve the water quality standards identified in the Plan Amendment within 90 days from the date the approval request is received. It is uncertain whether the U.S. EPA will approve or disapprove the water quality standards. Furthermore, the determination could result in litigation.

Second, since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal court, challenging the SWRCB’s adoption of the Bay-Delta Plan Amendment, including a legal challenge filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation. That litigation is in the early stage and there have been no dispositive court rulings as of this date.

Third, the Bay-Delta Plan Amendment is not self-implementing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the Plan Amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the 401 certification process in the Federal Energy Regulatory Commission’s relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-23 timeframe. This process and the other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility (and therefore a different water supply impact on the SFPUC).

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\(^1\) SFPUC’s “retail service area” refers to water customers inside the City and County of San Francisco, as well as select areas outside of the City.

\(^2\) Unimpaired flow represents the water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds. Bay-Delta Plan Amendment, Introduction, p.1-8.
Fourth, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, SWRCB Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a “Delta watershed-wide agreement, including potential flow measures for the Tuolumne River” by March 1, 2019, and to incorporate such agreements as an “alternative” for a future amendment to the Bay-Delta Plan to be presented to the SWRCB “as early as possible after December 1, 2019.” In accordance with the SWRCB’s instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with the SWRCB (“March 1st Proposed Voluntary Agreement”). On March 26, 2019, the Commission adopted Resolution No. 19-0057 to support SFPUC’s participation in the Voluntary Agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency and the leadership of the Newsom administration. The negotiations for a voluntary agreement have made significant progress since an initial framework was presented to the SWRCB on December 12, 2018. The package submitted on March 1, 2019 is the product of renewed discussions since Governor Newsom took office. While significant work remains, the package represents an important step forward in bringing together diverse California water interests.

For all these reasons, whether and when the Bay-Delta Plan Amendment will be implemented, and how those amendments if implemented will affect the SFPUC’s water supply is currently uncertain and possibly speculative. Given this uncertainty, this WSA analyzes water supply and demand through 2040 under three scenarios: (1) No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement (“Scenario 1”), (2) Implementation of the March 1st Proposed Voluntary Agreement (“Scenario 2”), and (3) Implementation of the Bay-Delta Plan Amendment (“Scenario 3”).

1.1.3 Basis for Requiring a WSA for the Proposed Project

Except for the WSA approved on June 13, 2017 (Resolution No. 17-0142), which is superseded by this revised WSA, the proposed project has not been the subject of a previous WSA, nor has it been part of a larger project for which a WSA was completed.

The proposed project qualifies for preparation of a WSA under Water Code Section 10912(a) because it is a mixed-use residential development that includes more than 500 dwelling units. The proposed project is characterized further in Section 1.2.

1.1.4 Conclusion of this WSA

This WSA concludes that under Scenarios 1, 2, and 3, the SFPUC’s total projected water supplies would meet the demands of the proposed project and cumulative retail water demands through 2040 in normal years. Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully-implemented infrastructure under the 2018 Phased Water System Improvement Program (WSIP) Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly 9 normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly 1 out of every 10 years. This frequency is expected to increase as climate change intensifies.

**Scenario 1 - No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement:** Under Scenario 1, SFPUC’s total projected water supplies would meet the projected demands of the retail service area in normal years. During dry years, there would be a shortfall of 3.6-6.1 million gallons per day (mgd), or 5-7%. The SFPUC could manage this relatively small shortfall by prohibiting certain discretionary outdoor water uses and/or calling for voluntary rationing among all retail

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customers pursuant to its Retail Water Shortage Allocation Plan (*Appendix L of the UWMP*).

**Scenario 2 - Implementation of the Voluntary Agreement:** The March 1st Proposed Voluntary Agreement has yet to be accepted by SWRCB as an alternative to the Bay-Delta Plan Amendment and thus the shortages that would occur with its implementation are not known with certainty. An analysis of water supply impacts comparable to the one provided in this WSA for Scenarios 1 and 3 is not available for Scenario 2. However, the flow releases under the Voluntary Agreement, unlike the Bay-Delta Plan Amendment, are not based on an unimpaired flow approach but on a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years when less flow is required, preserving more of the SFPUC’s stored water supply from the Tuolumne River. The resulting RWS supply shortfalls during dry years under the Voluntary Agreement would be less than those under the Bay-Delta Plan Amendment, and therefore would require rationing of a lesser degree and closer in alignment to the SFPUC’s adopted level of service (LOS) goal for the RWS of rationing of no more than 20% system-wide during dry years than that which would occur under Scenario 3. Indeed, in Resolution No. 19-0057, the Commission stated its intention that any final voluntary agreement “would allow the SFPUC to maintain the (1) Water Supply Level of Service Goal and Objectives and (2) Sustainability Level of Service Goal and Objectives adopted in Commission Resolution No. 08-0200.” Under Scenario 2, if SFPUC’s March 1st Proposed Voluntary Agreement were accepted by the SWRCB as an alternative to the Bay-Delta Plan Amendment, SFPUC would still face a shortfall in single dry and multiple dry years, thus requiring rationing across the retail service area, but of a much smaller magnitude. Rationing under Scenario 2, with implementation of the Voluntary Agreement, would be to a lesser degree than that under Scenario 3, with implementation of the Bay-Delta Plan Amendment.

**Scenario 3 - Implementation of the Bay-Delta Plan Amendment:** Under Scenario 3, during single dry and multiple dry years starting as soon as the year 2022, the estimated year of implementation of the Bay-Delta Plan Amendment, the SFPUC’s total projected water supplies cannot meet the demands of the retail service area, including those of the proposed project, without gradually increasing higher levels of water rationing of up to 50% through 2040 across the retail service area. For the proposed project specifically, the SFPUC may impose a lower level of rationing that takes into account the installation of water-efficient plumbing fixtures and non-potable water systems associated with new construction.

The relatively small volume of water demand generated by the proposed project itself would not exacerbate the projected shortfalls resulting from implementation of the Bay-Delta Plan Amendment. Regardless of whether the proposed project is constructed, with implementation of the Bay-Delta Plan Amendment, the SFPUC’s existing and planned water supplies will not meet the water demands of its retail service area in dry years without greater rationing than previously projected in the 2015 UWMP.

Refer to Section 4.0, Conclusion, for a tabulated comparison of projected retail water supplies and demands under Scenarios 1 and 3, the resulting shortfalls, and the implications of rationing to the proposed project.

**1.2 Proposed Project Description**

The proposed project would redevelop the 10.25-acre parcel at 3333 California Street in the northwest portion of San Francisco from an office and parking use to a mix of residential, retail, commercial office, child care, and parking uses. It is currently used as the University of California San Francisco (UCSF) Laurel Heights Campus and is developed with two structures, three surface parking lots, two circular garage ramp structures, internal roadways and landscaping or landscaped open space.

Overall, the proposed project would entail the removal of approximately 376,000 gross square feet (gsf) of office uses with approximately 49,999 gsf relocated to the proposed
Walnut Building. The proposed project would include 558 dwelling units within 829,847 gsf of residential floor area. The proposed project would provide 49,999 gsf of commercial office floor area; 40,261 gsf of retail floor area; and a 13,630-gsf child care center use. Up to 823 vehicle parking spaces, including ten car share spaces, would be provided in multiple garages with up to three subterranean levels totaling approximately 374,809 gsf. Additionally, the proposed project would develop nearly half of the overall lot area (198,198 square feet) with a combination of public and private open spaces including: Euclid Park, Cypress Square, Mayfair Walk, and Walnut Walk. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site.

The project sponsor is considering a variant to the proposed project, referred to as the Walnut Building Variant. This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. The approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. Overall, approximately 1,434,098 gsf of new and rehabilitated space, comprising approximately 977,437 gsf of residential floor area; approximately 34,496 gsf of ground floor retail spaces; and approximately 14,665 gsf of childcare center space would be developed under the variant. Up to 919 vehicle parking spaces would be provided in multiple garages with up to three subterranean levels totaling approximately 407,500 gsf. Under this variant the footprints of the other proposed new buildings would not change. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site.

Construction of the proposed project, or its variant, would be phased. The preliminary construction plan would include four overlapping construction phases and is subject to change. Project construction would commence in 2020 and would occur within a maximum development period of 15 years.

Further details on both the proposed project and the Walnut Building Variant are provided in Attachment B. However, for the purpose of the WSA, only the Walnut Building Variant is assessed for water supply as it would result in the most conservative water demand estimate and would encompass the demands estimated for the proposed project. All references to the “proposed project” in this memo refers to the Walnut Building Variant unless otherwise noted.

2.0 Water Supply

This section reviews San Francisco’s existing and planned water supplies.

2.1 Regional Water System

See Section 3.1 of the UWMP for descriptions of the RWS and Section 6.1 of the UWMP for water rights held by City and County of San Francisco and the SFPUC Water System Improvement Program (WSIP).

2.2 Existing Retail Supplies

Retail water supplies from the RWS are described in Section 6.1 of the UWMP.

Local groundwater supplies, including the Westside Groundwater Basin, are described in Section 6.2.1 of the UWMP.

Local recycled water supplies, including the Harding Park Recycled Water Project and Pacifica Recycled Water Project, are described in Section 6.2.1 of the UWMP.

2.3 Planned Retail Water Supply Sources

The San Francisco Groundwater Supply Project is described in Section 6.2.2 of the UWMP. Since adoption of the UWMP, four wells have been completed and the start-up
phase of the project has begun. Starting in April 2017, small amounts of groundwater have been blended with RWS supplies for drinking water. Two remaining wells are under construction as part of the next phase of the project.

The proposed Westside and Eastside Recycled Water Projects, as well as non-potable water supplies associated with onsite water systems implemented in compliance with San Francisco’s Non-potable Water Ordinance (Health Code Chapter 12C), are also described in Section 6.2.2 of the UWMP.

2.4 Summary of Current and Future Retail Water Supplies

A breakdown of water supply sources for meeting SFPUC retail water demand through 2040 in normal years is provided in Section 6.2.5 of the UWMP. For dry years, see the next section.

Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully-implemented infrastructure under the 2018 Phased Water System Improvement Program (WSIP) Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly 9 normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly 1 out of every 10 years. This frequency is expected to increase as climate change intensifies.

2.5 Dry-Year Water Supplies

A description of dry-year supplies developed under WSIP is provided in Section 7.2 of the UWMP. Other water supply reliability projects and efforts that are currently underway or completed are described in Section 7.4 of the UWMP. Since adoption of the UWMP, the following milestones have occurred:

- Calaveras Dam Replacement Project – Construction of the new dam was completed in September 2018, while the remainder of the overall project will be completed in spring 2019.
- Regional Groundwater Storage and Recovery Project – Construction of this project is still underway. Phase 1 of the project, consisting of installation of 13 production wells, will be completed in 2019. Since May/June 2016, the project has been in a storage phase through periodic deliveries of RWS surface water in lieu of groundwater pumping by Daly City, San Bruno, and the California Water Service Company.

2.6 Additional Water Supplies

In light of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitations to RWS supply during dry years, the SFPUC is increasing and accelerating its efforts to acquire additional water supplies and explore other projects that would increase overall water supply resilience. Developing these additional supplies would reduce water supply shortfalls and reduce rationing associated with such shortfalls. In addition to the Daly City Recycled Water Expansion project\(^4\), which was a potential project identified in the 2015 UWMP and had committed funding at that time, the SFPUC has taken action to fund the study of potential additional water supply projects. Capital projects under consideration to develop additional water supplies include surface water storage expansion, recycled water expansion, water transfers, desalination, and potable reuse. The SFPUC is also considering developing related policies and ordinances, such as funding for innovative water supply and efficiency technologies and requiring potable water offsets for new developments. A more detailed list and descriptions of these efforts are provided below.

\(^4\) While this potential project was identified in the 2015 UWMP, it has since been approved by Daly City following environmental review and has a higher likelihood of being implemented.
The capital projects that are under consideration would be costly and are still in the early feasibility or conceptual planning stages. Because these water supply projects would take 10 to 30 or more years to implement, and because required environmental permitting negotiations may reduce the amount of water that can be developed, the yield from these projects are not currently incorporated into SFPUC’s supply projections. Capital projects would be funded through rates from both Wholesale and Retail Customers based on mutual agreement, as the additional supplies would benefit all customers of the RWS, unless otherwise noted. State and federal grants and other financing opportunities would also be pursued for eligible projects, to the extent feasible, to offset costs borne by ratepayers.

1. Daly City Recycled Water Expansion (Regional, Normal- and Dry-Year Supply, 3 mgd)

**Project Description:** The SFPUC and North San Mateo County Sanitation District (NSMCSD, or Daly City) have been exploring ways to increase the recycled water treatment capacity in Daly City to serve additional customers and decrease irrigation water withdrawals from the Westside Groundwater Basin, both in San Francisco and further south of Daly City. The majority of the irrigation demand met by groundwater withdrawals, approximately 2 mgd, serves cemeteries in Colma. An initial feasibility study completed in 2010 identified the capital requirements that would be needed to produce additional capacity at the existing treatment plant location. The study demonstrated that a new tertiary treatment facility would be required onsite to produce additional capacity of up to 3.4 mgd. Currently, flows that exceed the capacity of the existing treatment plant are discharged into the Pacific Ocean. With this project, some of that discharge may be treated and used for irrigation. New facilities would include a treatment facility, pump station, distribution pipelines, and storage.

**Estimated Costs and Financing:** The capital cost is estimated to be $85 million, which is budgeted for in the SFPUC’s 10-year capital planning horizon. The annual operations and maintenance (O&M) cost is estimated to be $3 million. This project may present regional benefits that would result in cost-sharing with Wholesale Customers because the replacement of groundwater used for irrigation with recycled water will result in a greater volume of groundwater storage that can be used in dry years as part of the SFPUC’s existing Groundwater Storage and Recovery project, approved by the SFPUC in 2014 in Resolution no. 14-0127.

**Permits and Approvals:** Daly City adopted a Final Initial Study/Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring and Reporting Program (MMRP) for the proposed project in September 2017. The SFPUC has not yet approved its participation in the project. Other permits and/or approvals that may be needed for this project include: BART, CAL/OSHA, San Francisco Bay RWQCB, and encroachment permits from Caltrans, Daly City, South San Francisco, SFPUC, San Mateo County, and Colma to construct distribution and storage facilities. Institutional agreements between the project partners for project construction and operation, as well as with the customers whose supplies will change from groundwater to recycled water, will also need to be developed.

**Estimated Acquisition:** Construction may occur as soon as 2023 with operation beginning in 2027.

2. Alameda County Water District Transfer Partnership (Regional, Normal- and Dry-Year Supply, 5 mgd)

**Project Description:** Water would be acquired from Contra Costa Water District (CCWD) for delivery to Alameda County Water District (ACWD) through the South Bay Aqueduct utilizing a planned expansion of the Los Vaqueros Reservoir.
Estimated Costs and Financing: The capital cost is estimated to be $50-150 million, with an annual O&M cost of $2.5 million.

Permits and Approvals: Planning and environmental review of the Los Vaqueros Reservoir Expansion is underway by CCWD, and has several objectives beyond water deliveries to the SFPUC. CCWD has identified over 15 permits, approvals and consultations that will be necessary such as Dredge and Fill, National Pollutant Discharge Elimination System (NPDES), Streambed Alteration, and Encroachment permits. These permits and approvals will be obtained by CCWD and/or its contractor. To enable a water supply transfer between ACWD and the SFPUC, water right modifications may be necessary and if additional infrastructure is needed, additional permits will be required. As this project is in the conceptual stage, permitting details have not yet been identified.

Estimated Acquisition: Construction may occur as soon as 2028 with operation beginning in 2032.

3. Brackish Water Desalination in Contra Costa County (Regional, Normal- and Dry-Year Supply, 9+ mgd)

Project Description: The Bay Area Brackish Water Treatment (Regional Desalination) Project is a partnership between CCWD, East Bay Municipal Utility District (EBMUD), SFPUC, Santa Clara Valley Water District (SCVWD) and Zone 7 to turn brackish water into a reliable, drought-proof drinking water supply, delivering a total of up to 10-20 mgd in drought and non-drought years (i.e., dry and normal years), throughout the region. A new brackish water treatment plant would be constructed in East Contra Costa and tie into the existing CCWD system for delivery through Los Vaqueros Reservoir and the South Bay Aqueduct, or delivery via a connection with EBMUD.

The SFPUC would rely on existing infrastructure and institutional agreements to receive water transfers from partner agencies. For planning and cost estimation purposes, it was assumed that the SFPUC’s share of the regional water supply would be 9 mgd in all year types; however, if additional capacity is available, the SFPUC may secure additional water supply, based on negotiations with partner agencies.

Estimated Costs and Financing: The capital cost is estimated to be $200-800 million, with an annual O&M cost of $12-20 million.

Permits and Approvals: To proceed, this concept would require extensive institutional agreements, permitting, and environmental review. Construction of a new desalination plant will require construction and operating permits such as NPDES, Dredge and Fill, consultations with federal and state agencies, and others. In addition, water rights will need to be secured and/or modified. In California, permitting and regulatory approvals of desalination projects has typically taken 10-18 years. In addition, institutional agreements among partner agencies will be needed.

Estimated Acquisition: Construction may occur as soon as 2032 and be phased so that 5-9 mgd would be available to the region by 2035 and a total of 5-11 mgd would be available after 2040.

4. ACWD-USD Purified Water Partnership (Regional, Normal- and Dry-Year Supply, 5 mgd)

Project Description: This may be an indirect or direct potable reuse project that would inject highly-treated water from Union Sanitary District (USD) for groundwater recharge, then recover the water through the ACWD Brackish
Groundwater Desalination Plant. How the water is transferred to the SFPUC remains to be determined.

**Estimated Costs and Financing:** The capital cost is estimated to be $200-400 million, with an annual O&M cost of $2.5 million.

**Permits and Approvals:** An initial assessment will be underway in 2019, which will identify potential project scenarios. Permitting and approvals for a project will depend on its design and nature, which have not yet been identified.

**Estimated Acquisition:** Construction may occur as soon as 2038 with operation beginning in 2045.

5. **Crystal Springs Purified Water** (Regional, Normal- and Dry-Year Supply, 6+ mgd)

**Project Description:** This is an indirect potable reuse project that would blend wastewater from Silicon Valley Clean Water and possibly San Mateo into Crystal Springs Reservoir and treat the blended water at Harry Tracy Water Treatment Plant for potable reuse.

**Estimated Costs and Financing:** The capital cost is estimated to be $400-700 million, with an annual O&M cost of $18-25 million.

**Permits and Approvals:** Construction and operating permits would be required for this project. They would likely include NPDES, Encroachment, consultations with state and federal agencies, and others. Surface water augmentation is regulated by the SWRCB, and consultations and public hearings would be required.

**Estimated Acquisition:** Construction may occur as soon as 2034 and be phased so that 3-5 mgd would be available to the region by 2035 and a total of 3-7 mgd would be available after 2040.

6. **Eastside Purified Water** (Retail, Normal- and Dry-Year Supply, 5 mgd)

**Project Description:** A purified water plant would be constructed at the Southeast Treatment Plant to blend wastewater with Regional Water System supplies for potable use.

**Estimated Costs and Financing:** The capital cost is estimated to be $220-400 million, with an annual O&M cost of $5-10 million.

**Permits and Approvals:** There is currently no regulatory framework in place to enable direct potable reuse. In California, no regulations are anticipated before 2025, but it is anticipated that extensive consultation will be required with the SWRCB. In addition, construction and operating permits and approvals will be required, as identified.

**Estimated Acquisition:** Construction may occur as soon as 2025 with operation beginning in 2030.

7. **San Francisco Eastside Satellite Recycled Water Facility** (Retail, Normal- and Dry-Year Supply, < 1 mgd)

**Project Description:** A centralized recycled water treatment facility would be constructed on the eastern side of San Francisco, along with pipelines and a storage reservoir, to meet demands not addressed by the Non-potable Water Ordinance and Auxiliary Water Supply System (AWSS).
Estimated Costs and Financing: The capital cost is estimated to be $200 million, with an annual O&M cost of $2.5 million.

Permits and Approvals: In addition to construction-related permits and approvals, this project would require a permit from the Regional Water Quality Control Board under its General Order for water reuse. Discharges from the recycled water treatment plant to the San Francisco Bay would also require NPDES permitting by the Regional Water Quality Control Board.

Estimated Acquisition: Construction may occur as soon as 2032 with operation beginning in 2037.

8. Additional Storage Capacity in Los Vaqueros Reservoir from Expansion (Regional)

Project Description: Expansion of storage capacity in Los Vaqueros is to allow the ACWD Transfer Partnership and Brackish Water Desalination in Contra Costa County to be optimized.

Estimated Costs and Financing: The capital cost is estimated to be $20-50 million. SFPUC’s portion of the project yield and cost share are not yet known. The annual O&M cost is yet to be estimated.

Permits and Approvals: Planning and review of the Los Vaqueros Reservoir Expansion is underway by CCWD, and has several objectives beyond water deliveries to the SFPUC. CCWD has identified over 15 permits, approvals and consultations that will be necessary such as Dredge and Fill, NPDES, Streambed Alteration, and Encroachment permits. These permits and approvals will be obtained by CCWD and/or its contractor. To enable a water supply transfer between ACWD and the SFPUC, water rights modifications may be necessary and if additional infrastructure is needed, additional permits will be required. As this project is in the conceptual stage, permitting details have not yet been identified.

Estimated Acquisition: Construction may occur as soon as 2021 with operation beginning in 2027.

9. Calaveras Reservoir Expansion (Regional)

Project Description: Calaveras Reservoir would be expanded to create 289,000 AF additional capacity to store excess Regional Water System supplies or other source water in wet and normal years. In addition to reservoir enlargement, the project would involve infrastructure to pump water to the reservoir, such as pump stations and transmission facilities.

Estimated Costs and Financing: The costs of this project is yet to be determined.

Permits and Approvals: Similar to Los Vaqueros Reservoir Expansion, this project would require numerous permits, approvals and consultations, such as Dredge and Fill, NPDES, Streambed Alteration, Encroachment, possible water right modifications, etc. These permits and approvals will be obtained by SFPUC and/or its contractor. As this project is in the conceptual stage, permitting details have not yet been identified.

Estimated Acquisition: Construction may occur as soon as the early 2040s with operation beginning around 2050.

Even if all the capital projects above are implemented, the total amount of water and storage yielded would not be enough to make up for the dry year shortfall that may result from implementation of the Bay-Delta Plan Amendment as adopted, and would occur years after such shortfalls begin. Thus, the SFPUC continues to proactively...
explore opportunities for reuse and innovation, such as the following policies and ordinances:

- **Evaluation of Recycled Water Throughout Service Area** *(Regional and Retail)*
  Wastewater treatment plants throughout the SFPUC service area would be surveyed to identify potential non-potable, indirect potable, and direct potable projects.

- **Innovative Technology Project Funding** *(Retail)*
  SFPUC would award grants for innovative demonstration projects that would increase water efficiency and availability (e.g., fog catchers, heat exchangers in non-potable water systems, rainwater for potable use, breweries treating process water for reuse).

- **New Development Potable Offset Ordinance** *(Retail)*
  The Board of Supervisors could adopt an ordinance requiring certain large development projects, to offset the water demand impacts above historical water consumption averages for the corresponding parcel(s). Developments could be required to achieve a certain offset of potable demands.

### 3.0 Water Demand

This section reviews the climatic and demographic factors that may affect San Francisco’s water use, projected retail water demands, and the demand associated with the proposed project.

#### 3.1 Climate

San Francisco has a Mediterranean climate. Summers are cool and winters are mild with infrequent rainfall. Temperatures in the San Francisco area average 57 degrees Fahrenheit annually, ranging from the mid-40s in winter to the upper 60s in late summer. Strong onshore flow of wind in summer keeps the air cool, generating fog through September. The warmest temperatures generally occur in September and October. Rainfall in the San Francisco area averages about 22 inches per year and is generally confined to the “wet” season from late October to early May. Except for occasional light drizzles from thick marine stratus clouds, summers are nearly completely dry. A summary of the temperature and rainfall data for the City of San Francisco is included in Table 1.
Table 1: San Francisco Climate Summary

<table>
<thead>
<tr>
<th>Month</th>
<th>Average Maximum Temperature (°F)</th>
<th>Average Minimum Temperature (°F)</th>
<th>Average Monthly Rainfall (inches)</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>58.0</td>
<td>45.7</td>
<td>4.36</td>
</tr>
<tr>
<td>February</td>
<td>60.3</td>
<td>47.3</td>
<td>4.41</td>
</tr>
<tr>
<td>March</td>
<td>61.4</td>
<td>48.1</td>
<td>2.98</td>
</tr>
<tr>
<td>April</td>
<td>62.3</td>
<td>49.1</td>
<td>1.38</td>
</tr>
<tr>
<td>May</td>
<td>63.2</td>
<td>50.9</td>
<td>0.68</td>
</tr>
<tr>
<td>June</td>
<td>64.8</td>
<td>52.7</td>
<td>0.18</td>
</tr>
<tr>
<td>July</td>
<td>65.6</td>
<td>54.3</td>
<td>0.02</td>
</tr>
<tr>
<td>August</td>
<td>66.6</td>
<td>55.3</td>
<td>0.06</td>
</tr>
<tr>
<td>September</td>
<td>68.1</td>
<td>55.0</td>
<td>0.19</td>
</tr>
<tr>
<td>October</td>
<td>67.8</td>
<td>53.3</td>
<td>1.04</td>
</tr>
<tr>
<td>November</td>
<td>61.2</td>
<td>48.1</td>
<td>2.85</td>
</tr>
<tr>
<td>December</td>
<td>58.3</td>
<td>45.9</td>
<td>4.33</td>
</tr>
<tr>
<td>Annual</td>
<td>63.3</td>
<td>50.6</td>
<td>22.45</td>
</tr>
</tbody>
</table>

Source: Western Regional Climate Center (www.wrcc.dri.edu), 1981-2010 data from two San Francisco monitoring stations (Mission Dolores/SF#047772 and Richmond/SF#047767).

3.2 Proposed Project Water Demand

The project sponsor’s consultants provided a memo describing the methods and assumptions used to estimate the water demand of the proposed project, along with the resulting demand (Attachment B).

Because the proposed project must comply with San Francisco’s Non-potable Water Ordinance (Article 12C of the San Francisco Health Code), estimates for both potable and non-potable demands were submitted as part of the WSA request. The Non-potable Water Ordinance requires new commercial, mixed-use, and multi-family residential development projects with 250,000 square feet or more of gross floor area to install and operate an onsite non-potable water system. Such projects must meet their toilet and urinal flushing and irrigation demands through the collection, treatment, and use of available graywater, rainwater, and foundation drainage. While not required, projects may use treated blackwater or stormwater if desired. Furthermore, projects may choose to apply non-potable water to other non-potable water uses, such as cooling tower blowdown and industrial processes, but are not required to do so under the ordinance. As indicated in the water demand memo provided on behalf of the project sponsor in Attachment B, the proposed project would exceed the minimum requirements of the Non-potable Water Ordinance by using non-potable water for cooling in addition to using graywater and rainwater to meet toilet and urinal flushing and irrigation.

Both potable and non-potable demands for the proposed project were estimated using the SFPUC’s Non-potable Water Calculator and supplemented with additional calculations for cooling demands. The SFPUC reviewed the memo to ensure that the methodology is appropriate for the types of proposed water uses, the assumptions are valid and thoroughly documented along with verifiable data sources, and a professional standard of care was used. The SFPUC concluded that the demand estimates provided on behalf of the project sponsor are reasonable. Water demand associated
with the proposed project over the 20-year planning horizon is shown in the following Table 2.

The non-potable demand estimates in Table 2 are based on building uses anticipated at the time the WSA was requested, i.e., during the planning and environmental review stage of the proposed project. It is understood that these estimates will likely change as the proposed project's design progresses, and information submitted for the WSA request is not part of the proposed project's compliance with the Non-potable Water Ordinance. City review and approval of a proposed onsite water system must be performed separately through the Non-potable Water Program. However, the intent of providing a breakdown of potable and non-potable demand estimates in this WSA is to demonstrate that the proposed project will incorporate water reuse per City requirements and the proposed project's sustainability goals, if any. As noted earlier, the total demand of the proposed project, regardless of non-potable use, is already encompassed in the 2015 UWMP water demand projections. Furthermore, total demand represents the most conservative estimate and accounts for back-up potable supplies that must be provided by the SFPUC in the event that non-potable supplies serving the proposed project are unavailable.

Table 2: Water Demand Based on Project Phasing

<table>
<thead>
<tr>
<th>Demand of Proposed Project (mgd)</th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potable Demand</td>
<td>--</td>
<td>0.032</td>
<td>0.064</td>
<td>0.064</td>
<td>0.064</td>
</tr>
<tr>
<td>Non-potable Demand</td>
<td>--</td>
<td>0.011</td>
<td>0.020</td>
<td>0.020</td>
<td>0.020</td>
</tr>
<tr>
<td>Total Demand</td>
<td>--</td>
<td>0.043</td>
<td>0.084</td>
<td>0.084</td>
<td>0.084</td>
</tr>
<tr>
<td>Potential Potable Water Savings</td>
<td>--</td>
<td>25.6%</td>
<td>24.3%</td>
<td>24.3%</td>
<td>24.3%</td>
</tr>
<tr>
<td>as Percentage of Total Demand</td>
<td>--</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Notes: Construction would occur over four overlapping phases commencing in 2020 and within a maximum development period of 15 years (subject to change). While full buildout could occur as late as 2035, full buildout is assumed to occur earlier to provide conservative projections. Phases 1 is estimated to be completed as soon as in 2022, Phase 2 in 2023, Phase 3 in 2025, and Phase 4 in 2027. The estimates above reflect the Walnut Building Variant. The non-potable demand estimates above reflect non-potable water use for cooling (0.005 mgd) Water demand estimates for the proposed project are slightly lower and are provided in Attachment B.

The San Francisco Planning Department has determined that the proposed project is encompassed within the projections presented in LUA 2012 as indicated in the letter from the Planning Department to the SFPUC (Attachment A). Therefore, the demand of the proposed project is also encompassed within the San Francisco retail water demands that are presented in Section 4.1 of the UWMP, which considers retail water demand based on the LUA 2012 projections. The following Table 3 shows the demand of the proposed project relative to total retail demand.
### Table 3: Proposed Project Demand Relative to Total Retail Demand

<table>
<thead>
<tr>
<th></th>
<th>2020</th>
<th>2025</th>
<th>2030</th>
<th>2035</th>
<th>2040</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Retail Demand (mgd)(^1)</td>
<td>72.1</td>
<td>79.0</td>
<td>82.3</td>
<td>85.9</td>
<td>89.9</td>
</tr>
<tr>
<td>Potable Demand of Proposed Project (mgd)</td>
<td>--</td>
<td>0.032</td>
<td>0.064</td>
<td>0.064</td>
<td>0.064</td>
</tr>
<tr>
<td>Potable Demand of Proposed Project as Percentage of Total Retail Demand</td>
<td>--</td>
<td>0.04%</td>
<td>0.08%</td>
<td>0.07%</td>
<td>0.07%</td>
</tr>
<tr>
<td>Total Demand of Proposed Project (mgd)</td>
<td>--</td>
<td>0.043</td>
<td>0.084</td>
<td>0.084</td>
<td>0.084</td>
</tr>
<tr>
<td>Total Demand of Proposed Project as Percentage of Total Retail Demand(^2)</td>
<td>--</td>
<td>0.05%</td>
<td>0.10%</td>
<td>0.10%</td>
<td>0.09%</td>
</tr>
</tbody>
</table>

**Notes:**
1. Retail water demands per Table 4-1 of the UWMP, except for the 2020 demand projection, which was re-projected to take into account the lower demands being experienced due to the recent drought and the lag in occupancy of built units.
2. The proposed project is accounted for in the LUA 2012 projections, and subsequently, total demands associated with the proposed project are accounted for in the 2015 UWMP retail water demand projections.

### 4.0 Conclusion

#### 4.1 Comparison of Projected Supply and Demand

#### 4.1.1 Scenario 1: No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement

Table 4 below is adapted from Section 7.5 of the UWMP (Table 7-4) and compares the SFPUC’s retail water supplies and demands through 2040 during normal year, single dry-, and multiple dry-year periods under Scenario 1.

Local supplies (i.e., supplies not from the RWS) correspond to those in Table 6-7 of the UWMP. Procedures for determining RWS supply availability per the SFPUC’s WSAP, applicable to all three scenarios, are described in Section 8.3 of the UWMP.

The projections shown in Table 4 differ from those in the 2015 UWMP due to two reasons. First, the 2009 Water Supply Agreement between SFPUC and its Wholesale Customers was recently amended and approved by the Commission on December 11, 2018 by Resolution No. 18-0212. Table 4 incorporates the minimum level of 5% rationing during supply shortages as required by the amendment, and therefore, the resulting shortfalls are greater than those previously projected in the 2015 UWMP.

Second, the projections in Table 4 differ from those in the 2015 UWMP because Table 4 reflects SFPUC’s full 8.5-year design drought sequence instead of the minimum 3-year sequence required to be provided in the 2015 UWMP. Under legislation adopted in 2018 (S.B. 606) future UWMPs will be required to project water supply availability during a minimum of 5 years of continuous drought (Water Code section 10631(b)(1)).

As explained previously in Section 3.2, water demands associated with the proposed project are already captured in the retail demand projections presented in the UWMP. The proposed project is expected to represent up to 0.10% of the total retail water demand. Total retail demands correspond to those in Table 4-1 of the UWMP, and reflect both passive and active conservation, as well as water loss.
As shown in Table 4, under Scenario 1 without implementation of the Bay-Delta Plan Amendment, existing and planned supplies would meet all projected RWS demands in all years except for an approximately 3.6-6.1 mgd, or 5-7%, shortfall during dry years through the year 2040. This relatively small shortfall is primarily due to implementation of the amended 2009 Water Supply Agreement. To manage a small shortfall such as this, the SFPUC may prohibit certain discretionary outdoor water uses and/or call for voluntary rationing by its retail customers pursuant to its Retail Water Shortage Allocation Plan (Appendix L of the UWMP). The required level of rationing is well below the SFPUC’s RWS LOS goal of limiting rationing to no more than 20% on a system-wide basis (i.e., an average throughout the RWS).
Table 4: Projected Supply and Demand Comparison Under Scenario 1  
(No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement) (mgd)

<table>
<thead>
<tr>
<th>Year</th>
<th>Normal Year</th>
<th>Single Dry Year</th>
<th>Multiple Dry Years</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Year 1(^1)</td>
<td>Year 2(^2)</td>
</tr>
<tr>
<td>2020</td>
<td>Total Retail Demand(^4)</td>
<td>72.1</td>
<td>72.1</td>
</tr>
<tr>
<td></td>
<td>Total Retail Supply(^5)</td>
<td>72.1</td>
<td>68.5</td>
</tr>
<tr>
<td></td>
<td>Shortfall (mgd)</td>
<td>0.0</td>
<td>3.6</td>
</tr>
<tr>
<td></td>
<td>Shortfall as % of Demand</td>
<td>0.0%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2025</td>
<td>Total Retail Demand(^4)</td>
<td>79.0</td>
<td>79.0</td>
</tr>
<tr>
<td></td>
<td>Total Retail Supply(^5)</td>
<td>79.0</td>
<td>75.0</td>
</tr>
<tr>
<td></td>
<td>Shortfall (mgd)</td>
<td>0.0</td>
<td>4.0</td>
</tr>
<tr>
<td></td>
<td>Shortfall as % of Demand</td>
<td>0.0%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2030</td>
<td>Total Retail Demand(^4)</td>
<td>82.3</td>
<td>82.3</td>
</tr>
<tr>
<td></td>
<td>Total Retail Supply(^5)</td>
<td>82.3</td>
<td>78.2</td>
</tr>
<tr>
<td></td>
<td>Shortfall (mgd)</td>
<td>0.0</td>
<td>4.1</td>
</tr>
<tr>
<td></td>
<td>Shortfall as % of Demand</td>
<td>0.0%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2035</td>
<td>Total Retail Demand(^4)</td>
<td>85.9</td>
<td>85.9</td>
</tr>
<tr>
<td></td>
<td>Total Retail Supply(^5)</td>
<td>85.9</td>
<td>81.6</td>
</tr>
<tr>
<td></td>
<td>Shortfall (mgd)</td>
<td>0.0</td>
<td>4.3</td>
</tr>
<tr>
<td></td>
<td>Shortfall as % of Demand</td>
<td>0.0%</td>
<td>5.0%</td>
</tr>
<tr>
<td>2040</td>
<td>Total Retail Demand(^4)</td>
<td>89.9</td>
<td>89.9</td>
</tr>
<tr>
<td></td>
<td>Total Retail Supply(^5)</td>
<td>89.9</td>
<td>85.4</td>
</tr>
<tr>
<td></td>
<td>Shortfall (mgd)</td>
<td>0.0</td>
<td>4.5</td>
</tr>
<tr>
<td></td>
<td>Shortfall as % of Demand</td>
<td>0.0%</td>
<td>5.0%</td>
</tr>
</tbody>
</table>

Notes:
1. During a single dry year and multiple dry year 1 (year 2 of SFPUC’s design drought sequence), the retail allocation under the WSAP is 36.0% of available RWS supply, or 85.9 mgd. However, due to the Phased WSIP Variant, only 81 mgd of RWS supply can be delivered. RWS supply is capped at this amount.
2. During multiple dry years 2-6 (years 3-7 of SFPUC’s design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 79.5 mgd.
3. During multiple dry years 7 and 8 (years 8 and 8.5 of SFPUC’s design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 74.5 mgd.
4. Total retail demands correspond to those in Table 4-1 of the UWMP, except for the 2020 demand projection, which was re-projected to take into account the lower demands being experienced due to the recent drought and the lag in occupancy of built units.
5. Local supplies (i.e., supplies not from the RWS, including groundwater, recycled water, and non-potable water) correspond to those in Table 6-7 of the UWMP, with an additional 5% reduction in retail water use (incorporated as a reduction in total retail supply) per the amended Water Supply Agreement. Local supplies are assumed to be used before RWS supplies to meet retail demand.
4.1.2 Scenario 2: Implementation of the Voluntary Agreement

As stated earlier, the March 1st Proposed Voluntary Agreement has yet to be accepted by SWRCB as an alternative to the Bay-Delta Plan Amendment and thus the shortages that would occur with its implementation are not known with certainty. However, given that the objectives of the Voluntary Agreement are to provide fishery improvements while protecting water supply through flow and non-flow measures, the RWS supply shortfalls under the Voluntary Agreement would be less than those under the Bay-Delta Plan Amendment, and therefore would require rationing of a lesser degree than that which would occur under Scenario 3. The degree of rationing would also more closely align with the SFPUC’s RWS LOS goal of limiting rationing to no more than 20% on a system-wide basis in drought years. This goal was adopted in 2008 by the Commission (Resolution No. 08-0200).

4.1.3 Scenario 3: Implementation of the Bay-Delta Plan Amendment

Table 5 below provides projected supplies and demands under Scenario 3. The RWS is projected to experience significant shortfalls in single dry and multiple dry years starting as soon as 2022 and through 2040, regardless of whether the proposed project is constructed. These significant shortfalls are a result of implementation of the Bay-Delta Plan Amendment and not attributed to the incremental retail demand associated with the proposed project. Shortfalls would range from about 12 to 45 mgd, corresponding to rationing in the retail service area ranging 16-50%, over the next 20 years.

If additional water supplies were not acquired before the Bay-Delta Plan Amendment were implemented, the SFPUC would impose customer rationing to help balance water supply deficits during dry years.

Given the severity of the reduction in RWS supply with implementation of the Bay-Delta Plan Amendment, existing and planned dry-year supplies would not be enough to meet projected retail demands without rationing above the SFPUC’s RWS LOS goal of limiting rationing to 20% on a system-wide basis for all dry years starting as soon as 2022. Although the WSAP does not address implications to retail supply during system-wide shortages above 20%, the WSAP indicates that if system-wide shortage greater than 20% were to occur, RWS supply would be allocated between retail and Wholesale Customers per the rules corresponding to a 16-20% system-wide reduction, subject to consultation and negotiation between the SFPUC and its Wholesale Customers to modify the allocation rules. The allocation rules corresponding to the 16-20% system-wide reduction are reflected in Table 5 above for Scenario 3. These allocation rules result in shortfalls of 16-50% across the retail service area as a whole under Scenario 3.
### Table 5: Projected Supply and Demand Comparison Under Scenario 3
(Implementation of the Bay-Delta Plan Amendment) (mgd)

<table>
<thead>
<tr>
<th></th>
<th>Normal Year</th>
<th>Single Dry Year</th>
<th>Multiple Dry Years</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Year 1(^1)</td>
<td>Year 2(^2)</td>
<td>Year 3(^2)</td>
<td>Year 4(^2)</td>
<td>Year 5(^2)</td>
<td>Year 6(^2)</td>
<td>Year 7(^3)</td>
<td>Year 8(^3)</td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td></td>
<td></td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
<td>72.1</td>
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<tr>
<td>Total Retail Demand(^4)</td>
<td>72.1</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
</tr>
<tr>
<td>Total Retail Supply(^5)</td>
<td>72.1</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
<td>68.5</td>
</tr>
<tr>
<td>Shortfall</td>
<td>0.0</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
<td>3.6</td>
</tr>
<tr>
<td>Shortfall as % of Demand</td>
<td>0.0%</td>
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**Notes:**
1. During a single dry year and multiple dry year 1 (year 2 of SFPUC’s design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 59.6 mgd.
2. During multiple dry years 2-6 (years 3-7 of SFPUC’s design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 45.7 mgd.
3. During multiple dry years 7 and 8 (years 8 and 8.5 of SFPUC’s design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 35.8 mgd.
4. Total retail demands correspond to those in Table 4-1 of the UWMP, except for the 2020 demand projection, which was re-projected to take into account the lower demands being experienced due to the recent drought and the lag in occupancy of built units.
5. Local supplies (i.e., supplies not from the RWS, including groundwater, recycled water, and non-potable water) correspond to those in Table 6-7 of the UWMP. Local supplies are assumed to be used before RWS supplies to meet retail demand.
4.2 Rationing Implications to the Proposed Project

While the levels of rationing described above apply to the retail service area as a whole (i.e., 5-7% under Scenario 1, 16-50% under Scenario 3), the SFPUC may allocate different levels of rationing to individual retail customers based on customer type (e.g., dedicated irrigation, single family residential, multi-family residential, commercial, etc.) to achieve the required level of retail system-wide rationing. Allocation methods and processes that have been considered in the past and may be used in future droughts are described in the SFPUC’s current Retail Water Shortage Allocation Plan (Appendix L of the UWMP). However, additional allocation methods that reflect existing drought-related rules and regulations adopted by the Commission during the recent drought (2015-2016 Drought Program adopted by Resolution 15-0119) are more pertinent to current and foreseeable development and water use in San Francisco and may be included in the SFPUC’s update to its Retail Water Shortage Allocation Plan. The updated Retail Water Shortage Allocation Plan will be brought forward to the Commission along with the 2020 Urban Water Management Plan for consideration and adoption through a public hearing process in 2021. It is anticipated that the updated Retail Water Shortage Allocation Plan would include a tiered allocation approach that imposes lower levels of rationing on customers who use less water than similar customers in the same customer class, and would require higher levels of rationing by customers who use more water. This approach aligns with the SWRCB’s statewide emergency conservation mandate imposed during the recent drought, in which urban water suppliers who used less water were subject to lower reductions than those who used more water. Imposing lower rationing requirements on customers who already conserve more water is also consistent with the implementation of prior rationing programs based on past water use, in which more efficient customers were allocated more water through an appeal process administered by the General Manager. Staff expects that under a future Retail Water Shortage Allocation Plan adopted by the Commission, the allocation method or combination of methods that would be applied during water shortages caused by drought would similarly be subject to the discretion of the General Manager.

The SFPUC anticipates that, as a worst-case scenario under Scenario 3, a mixed-use residential customer such as the proposed project could be subject to up to 38% rationing during a severe drought. In accordance with the Retail Water Shortage Allocation Plan, the level of rationing that would be imposed on the proposed project would be determined at the time of a drought or other water shortage and cannot be established with certainty prior to the shortage event. However, newly-constructed buildings, such as the proposed project, have water-efficient fixtures and non-potable water systems that comply with the latest regulations. Thus, if these buildings can demonstrate below-average water use, they would likely be subject to a lower level of rationing than other retail customers that meet or exceed the average water use for the same customer class.

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5 This worst-case rationing level for San Francisco multi-family residential was estimated for the purpose of preparing comments on behalf of the City and County of San Francisco on the SWRCB’s Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan, dated March 16, 2017. See comment letter Attachment 1, Appendix 3, Page 5, Table 3. The comment letter and attachments are available on the SWRCB website: [https://www.waterboards.ca.gov/public_notices/comments/2016_baydelta_plan_amendment/docs/dennis_herrera.pdf](https://www.waterboards.ca.gov/public_notices/comments/2016_baydelta_plan_amendment/docs/dennis_herrera.pdf). The rationing estimates prepared for the comment letter apply to the first 6 years of the SFPUC’s 8.5-year design drought as they reflect the 1987-92 drought. For the last 2.5 years of the design drought, a corresponding worst-case rationing level for San Francisco multi-family residential customers was not estimated. While the level of rationing imposed on the retail system will be higher for the outer years of the design drought compared to the first 6 years, it is reasonable to assume that multi-family residential customers such as the proposed project would not have to conserve more than 38%. 

4.3 Findings

Regarding the availability of water supplies to serve the proposed project beginning in 2022, the SFPUC finds, based on the entire record before it, as follows:

- During normal years, the SFPUC’s total projected water supplies will meet the projected demands of its retail customers, including those of the proposed project, existing customers, and foreseeable future development under Scenario 1, Scenario 2, and Scenario 3.

- During single dry years and multiple dry years under Scenario 1—No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement—the SFPUC can meet the projected demands of its retail customers, including those of the proposed project, existing customers, and foreseeable future development without the need for rationing beyond the LOS goal of 20% system-wide rationing. Based on past hydrology, statistically speaking dry years occur roughly once out of every 10 years.

- During single dry years and multiple dry years under Scenario 2—Implementation of the March 1st Proposed Voluntary Agreement—the SFPUC would still face a shortfall in single dry and multiple dry years, thus requiring rationing, but to a lesser degree and in closer alignment to the LOS goal of no more than 20% system-wide rationing compared to that which would occur under Scenario 3.

- During single dry years and multiple dry years under Scenario 3—Implementation of the Bay-Delta Plan Amendment—the SFPUC cannot reliably meet the projected demands of its retail customers, including the proposed project, existing customers, and foreseeable future development, without rationing at a level greater than that required to achieve the LOS goal of a maximum of 20% system-wide average rationing starting as soon as 2022. The SFPUC estimates it would impose up to 50% rationing across the retail service area and up to 38% rationing for mixed-use residential customers such as the proposed project.

Approval of this WSA by the Commission is not equivalent to approval of the development project for which the WSA is prepared. A WSA is an informational document required to be prepared for use in the City’s environmental review of a project under CEQA. It assesses the adequacy of water supplies to serve the proposed project and cumulative demand.

Furthermore, this WSA is not a “will serve” letter and does not verify the adequacy of existing distribution system capacity to serve the proposed project. A “will serve” letter and/or hydraulic analysis must be requested separately from the SFPUC City Distribution Division to verify hydraulic capacity.

While this WSA contains information provided by or on behalf of the project sponsor regarding the proposed project’s plans for onsite water reuse and demand estimates using the SFPUC’s Non-potable Water Calculator, any information submitted to the SFPUC for preparation of this WSA does not fulfill the requirements of the Non-potable Water Ordinance. City review and approval of a proposed onsite water system must be performed separately through the Non-potable Water Program.

If there are any questions or concerns, please contact Steve Ritchie at (415) 934-5736 or SRitchie@sfwater.org.
Attachments:  Attachment A, Communications from San Francisco Planning Department
Attachment B, 3333 California Street Project Demand Memo
Attachment A –

Communications from San Francisco Planning Department
DATE: June 13, 2013
TO: SF Planning EP Planners & SFPUC Planners
FROM: Scott T. Edmondson, AICP; Aksel Olsen
RE: Project Types Represented in the Land Use Allocation

This Memorandum explains the Planning Department’s Land Use Allocation (LUA) and the types of projects included in the LUA. The 2012 LUA is the most recent update and uses the Association of Bay Area Governments’ (ABAG) May 2012 Jobs-Housing Connection Scenario. As this memorandum explains, the Planning Department expects that the LUA will encompass the vast majority of development proposals that project sponsors will present to the Planning Department. This memorandum also identifies possible unusual circumstances under which EP Planners and the SF PUC Planners may want to consult further with the Planning Department’s Information and Analysis Group to determine whether a project is encompassed within the LUA.

ABAG’s Projections of San Francisco’s Economic Growth and the LUA

The LUA takes ABAG’s 30-year projections of citywide household and job growth and allocates them to smaller geographic units, in this case, the traffic analysis zones of the SF Transportation Authority’s Countywide Transportation Model. Thus, the LUA does not project growth but simply allocates ABAG’s growth projections to subarea locations within the city. The current 2012 LUA uses ABAG’s Jobs-Housing Connection Scenario projections for San Francisco and covers the period from 2010 to 2040; these projections were released in May 2012 and are represented in five-year increments.

ABAG derives its demographic and economic growth projections from assumptions about long-term demographic and economic growth.1 ABAG maintains its own set of regional models and develops each forecast with its in-house experts and private economic consultants.2 The forecasting is informed by the best information and assumptions available through federal and State agencies, such as the State Department of Finance, and private sources. However, ABAG develops its forecast based on local knowledge from over 50 years of forecasting and develops the forecast to reflect local conditions in contrast to more general forecasting assumptions of State or federal sources. ABAG’s estimate of total citywide growth for the 30-year period is expected to best represent actual growth at the end of the 30-year period. However, projected growth for any portion of the projection period, such as growth in a one-year or a five-year period, would be expected to vary from actual growth in such periods. Within the 30-year growth projection period, higher than average growth periods could be followed by lower than average growth periods such that growth over the period would ultimately equal the projected 30-year
total. All projection methodologies make assumptions based on the best available information at the time. To minimize the effects of imprecision intrinsic to any projections methodology when used in for planning decisions, ABAG follows professional best practices and updates its projections every two years. Accordingly, the Planning Department updates its LUA every two years. The planning practice of frequently updating projections and plans allows the incorporation of new information over time to provide for the most up-to-date projections.

The SFPUC updates its Urban Water Management Plan (UWMP) every five years. The UWMP typically relies on LUA projections or similar information. But, because the LUA is updated every two years, the SFPUC may want to review the LUA issued within SFPUC’s 5-year UWMP cycle; and if it varies in a significant way from the SFPUC’s projections used in its UWMP, discuss with Planning whether it should make any changes in its own water supply needs assessment during an UWMP cycle.

Types of Projects Included in the LUA

The LUA translates ABAG’s projected household and job growth into total expected development in San Francisco over a 30-year period. The LUA translates ABAG’s household growth into residential housing units and ABAG’s job growth into commercial space. Thus, the LUA projections of housing units and commercial space include all project types expected from San Francisco growth, such as housing, office, retail, production-distribution-repair (PDR), visitor, and cultural-institutional-educational (CIE). The LUA does not exclude any project type or potential growth. As such, the LUA and the ABAG economic projections upon which it is based contain the best estimates available of reasonably foreseeable growth and development in San Francisco over a 30-year period.

Unusual Circumstances

The LUA can be considered to include all reasonably expected growth and development and it is frequently updated to correct for expected variations. Nevertheless, there are possible unusual circumstances under which the EP Planners or SFPUC Planners may want to request further Planning Department consultation with the Information and Analysis Group to determine if a particular project falls within the LUA. ABAG’s projections and the Department’s LUA take into account urban economic trends and based on that information capture all reasonably foreseeable growth in San Francisco. Limited capital and aggregate demand of any urban economy constrains growth. However, occasionally the reality or perception may arise that a project lies outside the normal growth constraints of the San Francisco economy for some reason, and therefore lies outside ABAG’s projection’s and the Department’s current spatial allocation in its LUA.

One can envision the rare case of a project arising outside the City’s economy (demand and capital) from an organization not located in San Francisco using nonprofit foundation funds or private donations to construct a large institutional project in San Francisco, such as a major hospital, a university, or an office complex. These projects would represent spending and demand beyond that normally active in the San Francisco economy, and therefore represent net additions to projected growth beyond that captured by ABAG’s projections and reflected in the Department’s LUA. Indicative characteristics of such projects
would include those with non-local sponsors, of large size, and for an institutional land use. Alternatively, very large project proposals from local project sponsors active in the SF economy involving a large site, land assembly, a planned unit development (PUDs), master plans, or area plan and rezoning proposals may warrant individual assessment for a range of reasons even though they are likely captured in ABAG’s projections and the LUA. Such projects would be similar to recent projects such as Hunters Point/Candlestick, Park Merced, Treasure Island, Pier 70 Master Plan, Eastern Neighborhoods, or the Transit Center District Plan.

The bi-annual update of ABAG’s projections and the LUA would be able to capture development associated with such projects. However, should such a project be proposed between updates, the EP Planners and SFPUC could treat its appearance as sufficient cause to request the Planning Department’s assistance in determining whether to consider the project outside the latest LUA projections.

1 Please see ABAG’s summary of its research and forecasting on its website: http://www.abag.ca.gov/planning/research/index.html
3 The LUA citywide totals only differ slightly, up to within one percent of ABAG totals (+/-). The difference is produced by LUA’s complex method of translating ABAG projections into development (residential units and commercial space) and allocating total citywide growth to subarea locations. The minor difference between the LUA and ABAG citywide totals is real in absolute terms, but not in the sense that they are different projections. The one percent difference does not constitute a difference of projections. ABAG and MTC consider variation of one percent in citywide totals, plus or minus, as sufficiently representing ABAG’s projections for consistency with the MTC regional projections and modeling purposes (congestion management, etc.). Even if a few versions of the LUA must be done to make minor subarea spatial allocation corrections, as long as the LUA’s citywide totals are within one percent of ABAG’s projections, and ABAG’s projections have not changed, the LUA citywide totals have not effectively changed either. Any of those LUA versions’ citywide totals fully represent the same unchanged ABAG projection totals.
Attachment B –

3333 California Street Project Demand Memo
DATE: May 16, 2019
TO: Fan Lau, SFPUC
FROM: Chris Thomas, Environmental Planning
CC: Kei Zushi, Environmental Planning
RE: 3333 California Street Project Revised Water Supply Assessment Request (Planning Department Case No. 2015-014028ENV)

On June 13, 2017 the San Francisco Public Utilities Commission (SFPUC) approved a Water Supply Assessment (WSA) for the proposed 3333 California Street project (Resolution 17-0142). After this approval, on December 12, 2018, the State Water Resources Control Board (SWRCB) adopted an amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan), which establishes water quality objectives to maintain the health of certain rivers and the Bay-Delta ecosystem. Specific requirements for unimpaired flow on the Tuolumne River under the Bay-Delta Plan Amendment, as currently adopted, would have a significant impact to the regional water system supply delivered by the SFPUC.

Certain aspects of the project description of the 3333 California Street project provided with this request has changed somewhat from the project description included with the June 13, 2017 approval. The total number of 13 buildings proposed has remained the same:

- Two (2) four- to five-story mixed use residential buildings with ground floor retail along California Street between Laurel and Walnut Streets (the Plaza A and Plaza B Buildings);
- One (1) three-story mixed use (ground floor retail and child care) with commercial office building along California Street east of Walnut Street (the Walnut Building);
- Two (2) four- to six-story mixed use buildings along Masonic and Euclid Avenues (the Masonic and Euclid Buildings);
- Seven (7) three- to four-story townhomes along Laurel Street (the Laurel Duplexes); and
- One (1) four-story residential building near the Laurel Street and Mayfair Drive intersection (the Mayfair Building).

Both the project proposed in June 2017 and the currently proposed project also include a total of 558 residential units. As indicated in the table below, the combined areas by use have changed somewhat.
Previous and Current Proposed Project Sub-Areas

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a Structured parking would have no water demand and is therefore not included in water demand calculations.

As discussed in the project sponsor memo, a variant to the proposed project, referred to as the Walnut Building Variant (“variant”), is also being considered. This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. Under this variant, the approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. In this variant, the Walnut Building would be comprised of 147,590 gsf of residential use, 8,500 gsf of retail use, 14,665 gsf of childcare use, and a 172,211 gsf below grade garage. The total Walnut Building in the variant would be 342,966 gsf. Demand estimates are also provided for the variant. Although the total number of units (744) has remained the same, sub-areas by use in the proposed variant have also changed somewhat; however, its total size (1,434,098 gsf) is smaller than the variant proposed in June 2017 (1,473,001 gsf).

The proposed project and the variant would be built in four overlapping construction phases, with a maximum development period of 10 years.

Changes in the areas of use and refinements in some of demand estimates between the project and variant proposed in June 2017 and the current proposal have resulted in changes in demand. The total demand for the June 2017 project at buildout in 2035 was 0.0596 million gallons per day (mgd) while the total demand for the current project is 0.067 mgd. The total demand for the June 2017 variant was 0.0729 mgd while the total demand for the current variant is 0.084 mgd.

The purpose of this memorandum is to request that the SFPUC prepare a revised WSA for the proposed 3333 California Street mixed use project, in recognition of the Bay-Delta Plan Amendment and in compliance with CEQA Guidelines Section 15155 and Sections 10910 through 10915 of the California Water Code. The project description and water demand calculations for the 3333 California Street project have changed from the project considered by the WSA approved on June 13, 2017. The information provided by the project sponsor, intended to meet the requirements outlined in the SFPUC guidance memo dated September 6, 2016, is provided with this request. As indicated in the attached request for a Water Supply Assessment, two projects are currently under consideration: the proposed project which includes 558 dwelling units and the project variant which includes a total of 744 dwelling units. As indicated,
both developments would also include commercial office, retail, day care and open space components.

The project sponsor has provided project information intended to meet the requirements outlined in the SFPUC guidance memo dated September 6, 2016. The project is proposed to be constructed in four phases over a 10-year period. A summary of the project description, proposed average daily water demands, and supporting tables prepared by the project sponsor’s consultant (based on the SFPUC District Calculator Version 7), are attached. Non-Potable Water Calculator spreadsheets for both the proposed project and the variant are also attached.

Should you have questions or need additional information from the Planning Department or the project sponsor, please contact me at 415-575-9036 or christopher.thomas@sfgov.org.

Attachments

3333 California Updated WSA Package for SFPUC_051619.pdf
NP District Scale Calc_V7.1_3333CA_050919_phased.xlsx
NP District Scale Calc_V7.1_3333CA_050919_phased_variant.xlsx
Dear Mr. Thomas,

Upon your request, we have rerun the water supply calculations for the proposed redevelopment project at 3333 California Street (Block 1032 and Lot 003). The updates pertain to both minor changes to the proposed project and its variant (the Walnut Building Variant) and the use of the current version of the SFPUC Nonpotable District Scale Calculator Tool (version 7.1).

**PROJECT DESCRIPTION**

The proposed project would redevelop the 10.25-acre parcel at 3333 California Street in the northwest portion of San Francisco from an office and parking use to a mix of residential, retail, commercial office, child care, and parking uses. It is currently used as the University of California San Francisco (UCSF) Laurel Heights Campus and is developed with two structures, three surface parking lots, two circular garage ramp structures, internal roadways and landscaping or landscaped open space.

The proposed project would entail the demolition of the existing one-story annex building at the corner of California and Laurel Streets (northwest corner of the site), the demolition of the existing surface parking lots and circular garage ramp structures, and the partial demolition (approximately 49 percent) of the existing office building located at the center of the project site. The remaining portion of the existing office building would be divided into two separate residential buildings, Center Building A and Center Building B, with a two-story addition atop Center Building A and a two- to three-story addition above Center Building B. The proposed project would also include the construction of 13 new buildings along the California Street, Masonic Avenue, Euclid Avenue, and Laurel Street edges:
- Two (2) four- to five-story mixed use residential buildings with ground floor retail along California Street between Laurel and Walnut Streets (the Plaza A and Plaza B Buildings);
- One (1) three-story mixed use (ground floor retail and child care) with commercial office building along California Street east of Walnut Street (the Walnut Building);
- Two (2) four- to six-story mixed use buildings along Masonic and Euclid Avenues (the Masonic and Euclid Buildings);
- Seven (7) three- to four-story townhomes along Laurel Street (the Laurel Duplexes); and
- One (1) four-story residential building near the Laurel Street and Mayfair Drive intersection (the Mayfair Building).

Figure 1: Site Plan with Building Names Referenced in this Memorandum

Overall, the proposed project would entail the removal of approximately 376,000 gross square feet (gsf) of office uses with approximately 49,999 gsf relocated to the proposed Walnut Building. Table 1 provides a summary of the proposed changes.\(^1\) As noted below, the proposed project would include 558 dwelling

\(^1\) Square footages presented are approximate.
units within 829,847 gross square feet of residential floor area. The proposed project would provide 49,999 gross square feet of commercial office floor area; 40,261 gross square feet of retail floor area (29,263 of general retail and 12,998 gross square feet of food and beverage retail; and a 13,630-gross-square-foot child care center use. Up to 823 vehicle parking spaces, including ten car share spaces, would be provided in multiple garages with up to three subterranean levels totaling approximately 374,809 gross square feet. Estimated occupancy totals for the proposed uses were calculated using the occupant density defaults from the SFPUC Nonpotable Calculator Spreadsheet, which appear appropriate for the proposed mix of units. Additionally, the proposed project would develop nearly half the overall lot area (198,198sf) with a combination of public and private open spaces including: Euclid Park, Cypress Square, Mayfair Walk, and Walnut Walk. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site. The proposed project would also widen the adjacent sidewalks to meet the requirements of the Better Streets Plan and include street trees and other improvements as part of a series of proposed streetscape changes.
## Table 1: Proposed Project Summary

<table>
<thead>
<tr>
<th>Project Features</th>
<th>Existing</th>
<th>Existing to Be Retained</th>
<th>New Construction</th>
<th>Proposed Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwelling Units</td>
<td>--</td>
<td>--</td>
<td>558</td>
<td>558</td>
</tr>
<tr>
<td>Number of Buildings</td>
<td>2</td>
<td>1</td>
<td>13</td>
<td>14</td>
</tr>
<tr>
<td>Open Space</td>
<td>165,200 square feet</td>
<td>165,200 square feet</td>
<td>32,998 square feet</td>
<td>198,198 square feet</td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>543 *</td>
<td>543</td>
<td>280</td>
<td>823</td>
</tr>
<tr>
<td>Loading Spaces</td>
<td>5</td>
<td>--</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Bicycle Spaces</td>
<td>15</td>
<td>--</td>
<td>653</td>
<td>653</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Use</th>
<th>Existing Gross Square Footage</th>
<th>Existing Uses to Be Retained (gsf)</th>
<th>New Construction / Additions (gsf)</th>
<th>Proposed Project Totals (gsf)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office</td>
<td>364,500</td>
<td>49,999 c, d</td>
<td>-- d</td>
<td>49,999</td>
</tr>
<tr>
<td>Residential</td>
<td>--</td>
<td>--</td>
<td>829,847 e</td>
<td>829,847</td>
</tr>
<tr>
<td>Retail</td>
<td>--</td>
<td>--</td>
<td>40,261 f</td>
<td>40,261</td>
</tr>
<tr>
<td>Child Care</td>
<td>11,500</td>
<td>11,500</td>
<td>2,130</td>
<td>13,630 e</td>
</tr>
<tr>
<td>Structured Parking h</td>
<td>93,000</td>
<td>93,000</td>
<td>281,809</td>
<td>374,809</td>
</tr>
<tr>
<td><strong>Total gsf</strong></td>
<td><strong>469,000</strong></td>
<td><strong>154,499</strong></td>
<td><strong>1,154,047</strong></td>
<td><strong>1,308,546</strong></td>
</tr>
</tbody>
</table>

**Notes:**

a. Surface (331) and garage (212) parking spaces.

b. Retained numbers are use types retained rather than specific elements to be retained (e.g., office and child care use relocations to proposed Walnut Building, new and redeveloped open spaces, or parking count rather than specific parking lots to be retained). In some cases, the actual element is retained but modified from one use type to another (e.g., existing office building).

c. Existing office building would be retained and adaptively reused as two separate residential buildings (proposed Center Buildings A and B), the annex building would be demolished, and new office space would be added in the proposed Walnut Building.

d. Existing office uses would be relocated to the proposed Walnut Building.

e. Includes the adaptively reused office building (proposed Center Buildings A and B) and new residential uses along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street.

f. New retail uses would be developed at the ground floor of the proposed Plaza A, Plaza B and Walnut Buildings.

g. All proposed child care uses would be developed in the proposed Walnut Building.

h. The existing three-level, partially below-grade parking garage under the eastern portion of the existing office building would be reconstructed as part of the proposed California Street Garage under the proposed Plaza A, Plaza B, and Walnut Buildings as well as the adaptively-reused Center Building B. New below-grade parking would be developed under the proposed Masonic and Euclid Buildings, the proposed Laurel Duplexes, and the proposed Mayfair Building.

**Source:** Prado Group/PSKS, Planning Application Submittal, February 22, 2019.

## Table 2: Project Unit Types

### UNIT MIX/COUNT

<table>
<thead>
<tr>
<th>Level</th>
<th>JR</th>
<th>1-BED</th>
<th>2-BED</th>
<th>3-BED</th>
<th>4-BED or PH</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plaza Bldg A</td>
<td>16</td>
<td>22</td>
<td>23</td>
<td>4</td>
<td>0</td>
<td>67</td>
</tr>
<tr>
<td>Plaza Bldg B</td>
<td>9</td>
<td>21</td>
<td>25</td>
<td>6</td>
<td>0</td>
<td>61</td>
</tr>
<tr>
<td>Walnut</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Center Bldg A</td>
<td>0</td>
<td>24</td>
<td>11</td>
<td>6</td>
<td>0</td>
<td>51</td>
</tr>
<tr>
<td>Center Bldg B</td>
<td>0</td>
<td>51</td>
<td>48</td>
<td>30</td>
<td>9</td>
<td>139</td>
</tr>
<tr>
<td>Masonic</td>
<td>0</td>
<td>22</td>
<td>25</td>
<td>10</td>
<td>0</td>
<td>57</td>
</tr>
<tr>
<td>Euclid</td>
<td>0</td>
<td>25</td>
<td>54</td>
<td>30</td>
<td>0</td>
<td>139</td>
</tr>
<tr>
<td>Laurel Duplexes</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>17</td>
<td>14</td>
</tr>
<tr>
<td>Mayfair</td>
<td>0</td>
<td>12</td>
<td>7</td>
<td>11</td>
<td>0</td>
<td>30</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>27</td>
<td>207</td>
<td>194</td>
<td>103</td>
<td>27</td>
<td>500</td>
</tr>
</tbody>
</table>

| %                      | 5% | 27% | 39% | 20% | 5% | 100% |

**Source:** Prado Group/PSKS, Planning Application Submittal, February 22, 2019.
PROJECT DESCRIPTION: WALNUT BUILDING VARIANT

The project sponsor is considering a variant to the proposed project, referred to as the Walnut Building Variant (“variant”). This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. Under this variant, the approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. In this variant, the Walnut Building would be comprised of 147,590 gsf of residential use, 8,500 gsf of retail use, 14,665 gsf of childcare use, and a 172,211 gsf below grade garage. The total Walnut Building in the variant would be 342,966 gsf.

Under this variant the footprints of the other proposed new buildings would not change. Overall, approximately 1,434,098 gsf of new and rehabilitated space would be developed under the variant, broken down by space type in Table 3. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site.

Table 3: Walnut Building Variant Project Summary

<table>
<thead>
<tr>
<th>Project Features</th>
<th>Existing</th>
<th>Existing to Be Retained</th>
<th>New Construction</th>
<th>Proposed Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dwelling Units</td>
<td>--</td>
<td>--</td>
<td>744</td>
<td>744</td>
</tr>
<tr>
<td>Number of Buildings</td>
<td>2</td>
<td>1</td>
<td>13</td>
<td>14</td>
</tr>
<tr>
<td>Open Space</td>
<td>165,200 square feet</td>
<td>165,200 square feet</td>
<td>32,998 square feet</td>
<td>198,198 square feet</td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>543</td>
<td>543</td>
<td>376</td>
<td>919</td>
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<tr>
<td>Loading Spaces</td>
<td>5</td>
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<td>6</td>
<td>6</td>
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<tr>
<td>Bicycle Spaces</td>
<td>15</td>
<td>--</td>
<td>839</td>
<td>839</td>
</tr>
<tr>
<td>Use</td>
<td>Existing Gross Square Footage</td>
<td>Existing Uses to Be Retained (gsf)</td>
<td>New Construction / Additions (gsf)</td>
<td>Proposed Project Totals (gsf)</td>
</tr>
<tr>
<td>Office</td>
<td>364,500</td>
<td>-- c</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Residential</td>
<td>--</td>
<td>--</td>
<td>977,437 d</td>
<td>977,437</td>
</tr>
<tr>
<td>Retail</td>
<td>--</td>
<td>--</td>
<td>34,496 e</td>
<td>34,496</td>
</tr>
<tr>
<td>Child Care</td>
<td>11,500</td>
<td>11,500</td>
<td>3,165</td>
<td>14,665 f</td>
</tr>
<tr>
<td>Structured Parking</td>
<td>93,000</td>
<td>93,000</td>
<td>314,500</td>
<td>407,500</td>
</tr>
<tr>
<td><strong>Total gsf</strong></td>
<td>469,000</td>
<td>104,500</td>
<td><strong>1,329,598</strong></td>
<td><strong>1,434,098</strong></td>
</tr>
</tbody>
</table>

Notes:

a Surface (331) and garage (212) parking spaces.
b Retained numbers are use types retained rather than specific elements to be retained (e.g. office and child care use relocations to proposed Walnut Building, new and redeveloped open spaces, or parking count rather than specific parking lots to be retained). In some cases, the actual element is retained but modified from one use type to another (e.g. existing office building).
c Existing office building would be retained and adaptively reused as two separate residential buildings (proposed Center Buildings A and B) and the annex building would be demolished.
d Includes the adaptively reused office building (proposed Center Buildings A and B) and new residential uses along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street.
e New retail uses would be developed at the ground floor of the proposed Plaza A, Plaza B and Walnut Buildings.
f All proposed child care uses would be developed in the proposed Walnut Building.
g The existing three-level, partially below-grade parking garage under the eastern portion of the existing office building would be reconstructed as part of the proposed California Street Garage under the proposed Plaza A, Plaza B, and Walnut Buildings as well as the adaptively-reused Center Building B. New below-grade parking would be developed under the proposed Masonic and Euclid Buildings, the proposed Laurel Duplexes, and the proposed Mayfair Building.
PROPOSED CONSTRUCTION SCHEDULING AND PHASING

It is the intent of the project sponsor to phase the construction of the proposed project or its variant. The preliminary construction plan would include four overlapping construction phases and is subject to change. Project construction would commence in 2020 and would occur within a maximum development period of 15 years as follows:

Phase 1: Masonic and Euclid Buildings
- Duration: 30 month
- Phase would include the demolition of the existing annex building and the construction of residential, retail and garage space, as well as associated landscape area and public right of way improvements.

Phase 2: Center Buildings A and B (existing office building)
- Duration: 24 months; anticipated to commence on Month 20 of Phase 1
- Phase would include the partial demolition of the existing office building and the construction of residential and garage space.

Phase 3: California Street Buildings (Plaza A, Plaza B, and Walnut Buildings)
- Duration: 36 months; anticipated to commence on Month 15 of Phase 2
- Phase would include the construction of residential, retail, office, childcare, and garage space, as well as associated landscape and public right of way improvements (office is removed in the Walnut Variant).

Phase 4: Mayfair Building and Laurel Duplexes
- Duration: 20 months; anticipated to commence on Month 30 of Phase 3
- Phase would include the construction of residential and garage as well as associated landscape and public right of way improvements.

The preliminary construction phasing plan would also be applicable to the Walnut Variant.
Please note that the non-potable calculator has been run for the maximum number of phases it is configured to allow (three), by combining Phases 3 and 4.

Landscape, Roof Totals, and Phasing

The following table summarizes surface properties and areas for ground-level hardscape and planting (this area is actually mostly over subsurface parking) and building roofs.

Table 5: Landscape and roof areas by coverage type

<table>
<thead>
<tr>
<th>Phase</th>
<th>Hardscape</th>
<th>Planting Area</th>
<th>Conventional Roof</th>
<th>Green Roof</th>
<th>Total Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1</td>
<td>48,440</td>
<td>40,150</td>
<td>13,000</td>
<td>40,000</td>
<td>141,590</td>
</tr>
<tr>
<td>Phase 2</td>
<td>16,320</td>
<td>23,170</td>
<td>37,365</td>
<td>16,607</td>
<td>93,462</td>
</tr>
<tr>
<td>Phase 3+4</td>
<td>52,900</td>
<td>44,160</td>
<td>30,688</td>
<td>70,512</td>
<td>198,260</td>
</tr>
</tbody>
</table>

PROPOSED INTEGRATED WATER MANAGEMENT APPROACH

The proposed water management approach has not changed since the original application, and it is applicable to both the proposed project and its variant. Through this approach, the proposed project and its variant would comply with the requirements of City and County of San Francisco ordinances related to water conservation and resources, as applicable, including the San Francisco Green Building Ordinance, the Stormwater Management Ordinance and the Alternate Water Supplies/Reuse Ordinance, as well as the Water Efficient Irrigation, Residential Water Conservation, and Commercial Water Conservation Ordinances.
Water Conservation

The project site is served by San Francisco’s potable water supply system. To reduce the use of potable water on a per-unit basis, the proposed project would provide high-efficiency fixtures and appliances in new and existing buildings. These savings are not fully represented in the estimates here because the non-potable calculator uses flowrate defaults. Water wise landscaping would be employed. All nonpotable flushing and irrigation demands are intended to be met by collected rainwater and greywater treated onsite. The site is projected to use about 1/3 less potable water than a comparable development that meets the stringent CALGreen Code.

Stormwater and Wastewater

The project site is served by San Francisco’s combined sewer system and is subject to the City’s stormwater management requirements. The proposed project would reduce loading on the neighborhood stormwater infrastructure by collecting rainwater for reuse and managing stormwater through landscape and storage. These strategies combined with a site plan targeting over 50 percent planted area, including living roofs, should result in runoff reductions beyond the 25 percent required by the Stormwater Management Ordinance. No new or enlarged off-site wastewater collection facilities are proposed.

Water + Ecology

A site of this size has the potential to enhance the ecological assets of the neighborhood and city. The proposed project would preserve several major trees and greatly increase the total number of trees on the project site and the adjacent sidewalks. The proposed landscaping plans would favor native and adapted trees and plants that reduce irrigation demands while managing stormwater and promoting biodiversity.

WATER USE ESTIMATES

The following tables summarize the potable and nonpotable water demand estimates for the proposed project and the Walnut Building Variant and are based on the proposed uses and the preliminary construction phasing program, which has not changed. These estimates are preliminary and may be refined at a later time as project designs progress. The estimates include better than code average fixture flowrates (though are conservative in that they do not take the very lowest flowrate available in all cases), and include the high end of potential living roof area contemplated as a conservative case from a water supply perspective (more irrigation, less capturable rainwater). Targeted rainwater and greywater reuse would offset about 1/4 of the projected use according to the SFPUC calculator tool (see Attachment A for the Proposed Project and Attachment B for the Variant), but nonpotable demand is not subtracted from the below estimates.

Existing Usage

Site water use data provided to the project team from 2012-2014 indicate that existing usage tends to average about 20,000 gpd (0.02 mgd), with peak months averaging around 26,000 gpd (0.026 mgd). It is possible that this data set does not include 100% of the current site water demands.
**Proposed Project**

Table 6: Proposed Project Estimated Total Water Demand Based on Water Year Type

<table>
<thead>
<tr>
<th></th>
<th>Normal</th>
<th>Single dry</th>
<th>Multiple 2</th>
<th>Multiple 3</th>
<th>Multiple 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total estimated demand of proposed project (mgd)</td>
<td>0.067</td>
<td>0.068</td>
<td>0.069</td>
<td>0.069</td>
<td>0.069</td>
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<tr>
<td>Potable</td>
<td>0.046</td>
<td>0.046</td>
<td>0.046</td>
<td>0.046</td>
<td>0.046</td>
</tr>
<tr>
<td>Nonpotable</td>
<td>0.020</td>
<td>0.022</td>
<td>0.023</td>
<td>0.023</td>
<td>0.023</td>
</tr>
</tbody>
</table>

Note: Relative to the normal year, calculations assume that irrigation demand increases 30% in a single dry year, 40% in Multiple 2, 45% in Multiple 3 and 50% in Multiple 4. The increases are all to be served by nonpotable water, and no change to potable usage is assumed in dry years.

Table 7: Proposed Project Estimated Total Water Demand Based on Project Phasing

<table>
<thead>
<tr>
<th>Usage at End of Year</th>
<th>2015</th>
<th>2020</th>
<th>2025*</th>
<th>2030</th>
<th>2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total estimated demand of proposed project (mgd)</td>
<td>0</td>
<td>0</td>
<td>0.043</td>
<td>0.067</td>
<td>0.067</td>
</tr>
<tr>
<td>Potable</td>
<td>0</td>
<td>0</td>
<td>0.032</td>
<td>0.048</td>
<td>0.048</td>
</tr>
<tr>
<td>Nonpotable</td>
<td>0</td>
<td>0</td>
<td>0.011</td>
<td>0.018</td>
<td>0.018</td>
</tr>
</tbody>
</table>

*Phase 3 is scheduled for completion in December of 2025, so the 2025 estimate includes only Phases 1 and 2. All phases are included in the estimates for 2030 and 2035, but this is conservative from a water supply perspective because full buildout could occur as late as 2035.
**Walnut Building Variant**

Table 8: Variant Estimated Total Water Demand Based on Water Year Type

<table>
<thead>
<tr>
<th></th>
<th>Normal</th>
<th>Single dry</th>
<th>Multiple 2</th>
<th>Multiple 3</th>
<th>Multiple 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total estimated demand of proposed variant (mgd)</td>
<td>0.084</td>
<td>0.086</td>
<td>0.086</td>
<td>0.087</td>
<td>0.087</td>
</tr>
<tr>
<td>Potable</td>
<td>0.064</td>
<td>0.064</td>
<td>0.064</td>
<td>0.064</td>
<td>0.064</td>
</tr>
<tr>
<td>Nonpotable</td>
<td>0.020</td>
<td>0.022</td>
<td>0.023</td>
<td>0.023</td>
<td>0.023</td>
</tr>
</tbody>
</table>

Note: Relative to the normal year, calculations assume that irrigation demand increases 30% in a single dry year, 40% in Multiple 2, 45% in Multiple 3 and 50% in Multiple 4. The increases are all to be served by nonpotable water, and no change to potable usage is assumed in dry years.

Table 9. Variant Estimated Total Water Demand Based on Project Phasing

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2020</th>
<th>2025*</th>
<th>2030</th>
<th>2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total demand of proposed variant (mgd)</td>
<td>0</td>
<td>0</td>
<td>0.043</td>
<td>0.084</td>
<td>0.084</td>
</tr>
<tr>
<td>Potable</td>
<td>0</td>
<td>0</td>
<td>0.032</td>
<td>0.064</td>
<td>0.064</td>
</tr>
<tr>
<td>Nonpotable</td>
<td>0</td>
<td>0</td>
<td>0.011</td>
<td>0.020</td>
<td>0.020</td>
</tr>
</tbody>
</table>

*Phase 3 is scheduled for completion in December of 2025, so the 2025 estimate includes only Phases 1 and 2. All phases are included in the estimates for 2030 and 2035, but this is conservative from a water supply perspective because full buildout could occur as late as 2035.

If you have any questions, please feel free to reach out directly to me at 415-857-9324 or dbragg@pradogroup.com.

Regards,

Don Bragg
Development Director, Prado Group Inc.

Attachments: A: NP District Scale Calc v7.1: Proposed Project Summary (2 pgs.)
B: NP District Scale Calc v7.1: Variant Summary (2 pgs.)

cc: Kei Zushi, SF Planning Department
Peter Mye, SWCA
Lisa Congdon, Prado Group
## 1. Demands and Supplies Summary

### Demands Met by Non-Potable Supply for Project

<table>
<thead>
<tr>
<th>Source</th>
<th>Annual Supply (gpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rainwater</td>
<td>130,161</td>
</tr>
<tr>
<td>Stormwater</td>
<td>0</td>
</tr>
<tr>
<td>Graywater</td>
<td>4,455,862</td>
</tr>
<tr>
<td>Blackwater</td>
<td>0</td>
</tr>
<tr>
<td>Foundation Drainage</td>
<td>0</td>
</tr>
<tr>
<td>Cooling &amp; Other Supplies</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>3,565,962</td>
</tr>
</tbody>
</table>

### Project Total Annual Water Demand (gpy)

24,309,573

### If Grant Offset Criteria Met, Occurs in Year

2023

### Potable Make-Up Water Allocation (gpy)

477,004

### Avg. Daily Wet Weather Potable Allocation (gpd)

1,045

### Avg. Daily Dry Weather Potable Allocation (gpd)

1,567

---

*Note: Estimates based on Tab 6 - Building Potential Summary total water demand values. Manually entered non-potable demands that exceed auto-calculated non-potable demands from Tab 6 may result in Total Annual Water demands greater than the value used in this analysis.

---

Achieving estimated offset may require storage to store excess monthly supplies; potable supplies are allocated to this project to meet remaining demands. Projects are allocated an additional 10% in potable supplies as a buffer.

### 2. Building Information Summary

<table>
<thead>
<tr>
<th>Main Project Site 1</th>
<th>Site 2</th>
<th>Site 3</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project / Building Name:</strong></td>
<td>3333 California</td>
<td>3333 California Phase 2</td>
</tr>
<tr>
<td><strong>Project Address:</strong></td>
<td>3333 California St, San Francisco, CA</td>
<td>3333 California St, San Francisco, CA</td>
</tr>
<tr>
<td><strong>Assessor’s Block &amp; Lot No. / APN:</strong></td>
<td>1032/003</td>
<td>1032/003</td>
</tr>
<tr>
<td><strong>Year Online:</strong></td>
<td>2022</td>
<td>2023</td>
</tr>
<tr>
<td><strong>Building Type:</strong></td>
<td>Mixed</td>
<td>Mixed</td>
</tr>
<tr>
<td><strong>Total Building Size (gross square footage or GSF):</strong></td>
<td>267,675</td>
<td>321,402</td>
</tr>
<tr>
<td><strong>Total Lot Size (ft²):</strong></td>
<td>178,587</td>
<td>179,584</td>
</tr>
<tr>
<td><strong>Number of Residential Units:</strong></td>
<td>196</td>
<td>190</td>
</tr>
<tr>
<td><strong>Impervious Surface Above Grade (ft²):</strong></td>
<td>13,000</td>
<td>37,365</td>
</tr>
<tr>
<td><strong>Impervious Surface Below Grade (ft²):</strong></td>
<td>38,440</td>
<td>16,320</td>
</tr>
<tr>
<td><strong>Landscaped Area (ft²):</strong></td>
<td>50,150</td>
<td>59,777</td>
</tr>
<tr>
<td><strong>Site Location (Zone):</strong></td>
<td>Eastern SF</td>
<td>Eastern SF</td>
</tr>
</tbody>
</table>

### 3. Summary of Nonpotable Demands and Supplies for the Project

#### Non-Potable Water Supply Estimates

<table>
<thead>
<tr>
<th>Source</th>
<th>Annual Supply (gpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>On-site Alternate Water Source Supplies</strong></td>
<td></td>
</tr>
<tr>
<td>Rainwater</td>
<td>130,161</td>
</tr>
<tr>
<td>Stormwater</td>
<td>0</td>
</tr>
<tr>
<td>Graywater</td>
<td>4,455,862</td>
</tr>
<tr>
<td>Blackwater</td>
<td>0</td>
</tr>
<tr>
<td>Foundation Drainage</td>
<td>0</td>
</tr>
<tr>
<td>Cooling &amp; Other Supplies</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>3,565,962</td>
</tr>
</tbody>
</table>

#### Non-Potable Applications Estimates

<table>
<thead>
<tr>
<th>Source</th>
<th>Annual Demand (gpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Toilets/Urinals + Irrigation</strong></td>
<td></td>
</tr>
<tr>
<td>Toilets/Urinals</td>
<td>1,746,216</td>
</tr>
<tr>
<td>Irrigation</td>
<td>1,765,689</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>3,511,905</td>
</tr>
<tr>
<td><strong>Toilets/Urinals + Irrigation + Cooling</strong></td>
<td></td>
</tr>
<tr>
<td>Toilets/Urinals + Irrigation</td>
<td>1,746,216</td>
</tr>
<tr>
<td>Cooling Tower</td>
<td>1,765,689</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>3,511,905</td>
</tr>
<tr>
<td><strong>Commercial Laundry &amp; Other</strong></td>
<td></td>
</tr>
<tr>
<td>Commercial Laundry &amp; Other</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>0</td>
</tr>
</tbody>
</table>

**TOTAL: 2,072,323**

**Meeting Grant Criteria for Annual Offset in Year 2023**

Projects are allocated these potable supplies during wet weather months (October - March)

Projects are allocated these potable supplies during dry weather months (April - September)
4. Project Phasing

<table>
<thead>
<tr>
<th>15-Year Timeframe</th>
<th>SITE 1: 3333 California – 3333 California St, San Francisco, CA</th>
<th>SITE 2: 3333 California Phase 2 – 3333 California St, San Francisco, CA</th>
<th>SITE 3: 3333 California Phase 3+4 – 3333 California St, San Francisco, CA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>NP Offset Supplies (gpy)</td>
<td>Selected NP Demand (gpy)</td>
<td>NP Offset Supplies (gpy)</td>
</tr>
<tr>
<td>2022</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2023</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2024</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2025</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2026</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2027</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2028</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2029</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2030</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2031</td>
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<td>0</td>
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<tr>
<td>2032</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2033</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2034</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
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<tr>
<td>2035</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2036</td>
<td>3,565,962</td>
<td>2,072,323</td>
<td>0</td>
</tr>
</tbody>
</table>

This offset analysis assumes the full year of supplies is available to offset non-potable demands. Some scenarios may require storage to store excess supplies from one month in order to use those supplies in another month with unmet demands.

Onsite Supplies and Non-Potable Demand Over 15-Year Timeframe

Monthly Summary of Selected Onsite Supply vs. Selected Non-Potable Demand (All Sites On-Line)
1. Demands and Supplies Summary

<table>
<thead>
<tr>
<th>Category</th>
<th>Site 1</th>
<th>Site 2</th>
<th>Site 3</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demands Met by Non-Potable Supply for Project (gpy)</td>
<td>7,476,600</td>
<td>24%</td>
<td>38,723,797</td>
<td>Meets Grant Criteria for Annual Offset in Year 2023</td>
</tr>
<tr>
<td>Project Total Annual Water Demand (gpy)</td>
<td>559,971</td>
<td>2023</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Potable Make-Up Water Allocation (gpy)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Avg. Daily Wet Weather Potable Allocation (gpd)</td>
<td>1,273</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Avg. Daily Dry Weather Potable Allocation (gpd)</td>
<td>1,794</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. Building Information Summary

<table>
<thead>
<tr>
<th>Category</th>
<th>Site 1</th>
<th>Site 2</th>
<th>Site 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Address</td>
<td>3333 California St, San Francisco, CA</td>
<td>3333 California St, San Francisco, CA</td>
<td>3333 California St, San Francisco, CA</td>
</tr>
<tr>
<td>Assessor's Block &amp; Lot No. / APN</td>
<td>1032/003</td>
<td>1032/003</td>
<td>1032/003</td>
</tr>
<tr>
<td>Year Online</td>
<td>2022</td>
<td>2023</td>
<td>2027</td>
</tr>
<tr>
<td>Total Gross Square Footage (gross square footage or GSF)</td>
<td>267,675</td>
<td>321,402</td>
<td>437,521</td>
</tr>
<tr>
<td>Total Lot Size (ft²)</td>
<td>178,587</td>
<td>89,294</td>
<td>178,588</td>
</tr>
<tr>
<td>Number of Residential Units</td>
<td>196</td>
<td>190</td>
<td>358</td>
</tr>
<tr>
<td>Impervious Surface Above Grade (ft²)</td>
<td>13,000</td>
<td>33,706</td>
<td>30,688</td>
</tr>
<tr>
<td>Impervious Surface Below Grade (ft²)</td>
<td>6,440</td>
<td>52,900</td>
<td></td>
</tr>
<tr>
<td>Landscaped Area (ft²)</td>
<td>50,150</td>
<td>59,777</td>
<td>114,672</td>
</tr>
<tr>
<td>Site Location (Zone)</td>
<td>Eastern SF</td>
<td>Eastern SF</td>
<td>Eastern SF</td>
</tr>
</tbody>
</table>

3. Summary of Nonpotable Demands and Supplies for the Project

<table>
<thead>
<tr>
<th>Category</th>
<th>Site 1</th>
<th>Site 2</th>
<th>Site 3</th>
<th>Total (gpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Potable Water Supply Estimates</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>On-site Alternate Water Source Supplies</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rainwater</td>
<td>330,101</td>
<td>285,496</td>
<td>282,620</td>
<td>998,017</td>
</tr>
<tr>
<td>Stormwater</td>
<td>323,546</td>
<td>179,934</td>
<td>429,954</td>
<td>933,434</td>
</tr>
<tr>
<td>Graywater</td>
<td>1,435,862</td>
<td>3,330,682</td>
<td>6,309,114</td>
<td>13,075,658</td>
</tr>
<tr>
<td>Blackwater</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Foundation Drainage</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cooling &amp; Other Supplies</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3,889,508</td>
<td>3,796,112</td>
<td>7,021,688</td>
<td>14,707,308</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Category</th>
<th>Site 1</th>
<th>Site 2</th>
<th>Site 3</th>
<th>Total (gpy)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Potable Applications Estimates</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project Specific Non-Potable Application Demands</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Toilets/Urinals</td>
<td>874,276</td>
<td>847,512</td>
<td>1,946,359</td>
<td>3,668,147</td>
</tr>
<tr>
<td>Irrigation</td>
<td>1,273</td>
<td>1,214,106</td>
<td>2,806,793</td>
<td>5,599,706</td>
</tr>
<tr>
<td>Cooling Tower</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Commercial Laundry &amp; Other</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>2,072,323</td>
<td>1,912,356</td>
<td>4,492,073</td>
<td>7,476,752</td>
</tr>
</tbody>
</table>

*Note: Estimates based on Tab 6 - Building Potential Summary total water demand values. Manually entered non-potable demands that exceed auto-calculated non-potable demands from Tab 6 may result in Total Annual Water demands greater than the value used in this analysis.*
4. Project Phasing

<table>
<thead>
<tr>
<th>15-Year Timeframe</th>
<th>SITE 1: 3333 California Phases 1 &amp; 2 -- 3333 California St, San Francisco, CA</th>
<th>SITE 2: 3333 California Phase 2 -- 3333 California St, San Francisco, CA</th>
<th>SITE 3: 3333 California Phase 3-4 -- 3333 California St, San Francisco, CA</th>
</tr>
</thead>
<tbody>
<tr>
<td>NP Offset Supplies (gpy)</td>
<td>Selected NP Demand (gpy)</td>
<td>NP Offset Supplies (gpy)</td>
<td>Selected NP Demand (gpy)</td>
</tr>
<tr>
<td>2022</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>0</td>
</tr>
<tr>
<td>2023</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2024</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2025</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2026</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2027</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2028</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2029</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2030</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2031</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2032</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2033</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2034</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2035</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
<tr>
<td>2036</td>
<td>3,889,508</td>
<td>2,072,323</td>
<td>3,776,112</td>
</tr>
</tbody>
</table>

This offset analysis assumes the full year of supplies is available to offset non-potable demands. Some scenarios may require storage to store excess supplies from one month in order to use those supplies in another month with unmet demands.

---

**Onsite Supplies and Non-Potable Demand Over 15-Year Timeframe**

**Monthly Summary of Selected Onsite Supply vs. Selected Non-Potable Demand (All Sites On-Line)**

![Graphs showing monthly and annual demand and supply](image-url)