

July 12, 2010

ATTN: Andrea Contreras

City and County of San Francisco

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San Francisco Planning Department

1650 Mission Street Suite 400

San Francisco California 94103-2479

Re Project Address:

3155 Scott Street

Edward II Hotel Project

Case Number 2010.0420E

(Supportive Housing for Homeless Youth and Youth Emancipating out of Foster Care)

Transmitted Via Email

Dear Ms. Andrea Contreras:

Thank you for returning my call Thursday evening at 6 PM at my office. I write to you as the Planning Department representative regarding the above referenced subject via email as you agreed that this form of communication is acceptable. I believe the Planning Department's notice requesting public input is defective because it calls for factual responses without enough lead time and without sending the notice to enough members of the community. It is likely that the notice did not find its way to all property owners of lots within 300 feet of the lot in question. I reserve these issues for later discussion as may be needed and as the facts of the timing and mailing of the notice sustain or negate this contention. I believe re-notice is needed and that because of the magnitude and nature of the Project that interested San Franciscans be afforded reasonable opportunity to study the file and to communicate the facts to you regarding the Project. It would be important for the public file to be placed into electronic format so that members of the public could have real opportunity to review the public file so that they are able to identify other impacts associated with this Project that may warrant the preparation of a complete Environmental Impact Report.

Let me start with the assertion that there are legal requirements for a complete Environmental Impact Report regarding the proposed public Project so that it might be funded by both the City and the Federal government. The documentation is required under both NEPA and CEQA.

The planning documents reveal the proposed activity is a "Project" within the meaning of CEQA and that the Project it is not ministerial, and that the public housing Project lacks "no possible significant effects, lacks a statutory exemption and lacks a categorical exemption."

The public housing Project has significant environmental impacts that need to be evaluated, studied and considered before the Lead Agency, the City and County of San Francisco, by and through, the Mayor's Office of Housing, may legally have the Mayor approve financial documents enabling funding of the Project by the Federal and City governments. An Environmental Impact Report is needed before the Board of Supervisors and the Planning Department starts the process to up-zone the property to high intensity and high density uses by administrative action and legislation relating to a Special Use District. The Project contemplates major changes in density and uses. A high density SRO- like facility with substance abuse services for at risk youth is the new use. This change in use and density require an Environmental Impact Report completed to the standards of NEPA and CEQA. In addition to the zoning issues, there is a lack of planning on the City's part concerning the aggregate impact of its SRO/Group Living Housing Projects throughout the City. "With certain limited exceptions, a public agency must prepare and EIR whenever substantial evidence supports a fair argument that a proposed project may have a significant effect on the environment." Laurel Heights Improvement v. Regents of Univ. of Cal. (1993) 6 Cal. 4th 1112, 1123. (Underlining added)

An EIR is required before the Board of Supervisors considers any request from any private developer or City Agency for a Special Use District to change the zoning to eliminate the environmentally protective requirements concerning housing density, open space and parking that are required in NC-3 zoning district and a 40-X Height and Bulk district in which the property in question is situated. The fact that the proposed uses and high density of occupancy will require a Resolution by the Board of Supervisors to terminate and nullify existing environmental protections associated with parking and density requirements of the Planning and Zoning Ordinance indicates that the Lead Agency's proposed public housing development Project brings with it numerous "fair arguments" that the proposed project may have a significant impacts on the environment. The proposed uses promote significant overcrowding that requires the preparation of an EIR because the proposed tenants and the surrounding San Francisco residents will be adversely impacted by the overcrowding sought by the Project Developer and the City.

An Environmental Impact Report was required to be prepared for the City of San Francisco by the appellate court under its unpublished holding in San Franciscans for Livable Neighborhoods v. City and County of San Francisco (2007) A112987 Court of Appeal First Appellate District, Division Four by Sepulveda, J. The Neighborhood Groups who were the plaintiffs succeeded in their CEQA case. The plaintiffs showed "substantial evidence to support a fair argument that amendments to the housing element may have significant impact on the environment, thus requiring the preparation of and EIR." (Underlining added) This unpublished opinion ought to be well known to the Planning Department. I bring this unpublished opinion to your attention because changing the housing element requires an EIR. Here a portion of the housing element is involved. The City is furnishing almost free

housing to young adults without considering the City-wide impacts of its Project. Piecemeal planning and modifications to the housing element require an EIR. Instructive is the case Pocket Protectors v. City of Sacramento (2004) 124 Cal. App. 4th. 903,927. In Pocket Protectors the appellate court noted that the purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment. The fair argument standard of CEQA is a low threshold test for requiring the preparation of an EIR. It is a question of law, not fact, whether a fair argument exists, and the courts owe no deference to the lead agency's determination. Review is *de novo with a preference for resolving doubts in favor of environmental review.* Id. at 928. The actions of the City departments as lead agency toward allowing denser housing development, and decreased off-street parking which in turn could lead to increased traffic congestion, air pollution and noise were factors that the appellate court determined raised the "fair argument" in the San Franciscans for Livable Neighborhoods case. In this matter the same is true.

The file available under the public notice given by the June 29, 2010 posting and which requires public comments to be made in writing on or before the close of business of July 13, 2010 is incomplete and inadequate for any determination other than an EIR is required under CEQA regulations, Title 14 Division 6 Chapter 3 Article 5 California Code of Regulations commencing with section 15064 of the Natural Resources Code ("CEQA regulation section" "CEQA section" "CEQA guidelines" or "CEQA regulation") provide the regulations and guidelines the Lead Public Agency must follow. I cite a few of the regulations and certain published opinions to assist the Planning Department Representatives associated with the environmental aspects of the "Project" in their administrative determinations on the legally required documents for this Project to proceed. The Project needs a complete Environmental Impact Report EIR as a condition precedent to the Project's going forward because it is a legal requirement.

CEQA Regulation Section 15064 deals with "significance determination" for Projects which have impacts substantial enough to warrant the preparation of an EIR. When there is substantial evidence, in light of the whole record before a lead agency that a project may have a significant effect on the environment, the lead agency and each responsible agency shall make a finding under Regulation Section 15091 for each significant effect and may need to make a statement of overriding considerations under Regulation Section 15093. (Underline added)

To establish the significant effects the proposed project will have, I bring to the attention of all of the agencies of the City and County of San Francisco, that this Project promotes overcrowding and this overcrowding generates direct physical changes in the environment which are caused by and immediately related to the Project as presently proposed by the Lead Agency in its Environmental Assessment prepared by Christopher Joseph & Associates dated June 2010. This Environmental Assessment is totally inadequate to sustain any contention that the proposed public housing development does not have a significant impact on the environment and thus immune from CEQA requirements. The assessment was done for HUD to enable public funding from Federal sources.

Because detailed plans and specifications detailing the Public Housing Project are not in the file of the Planning Commission open for public review under the notice of June 29, 2010, or in the Christopher Joseph Environmental Assessment dated June 2010, the public file itself generates a fair argument that the project will have a significant effect on the environment. The absence of detailed plans and

specifications in fact raise a fair argument that adverse changes to the environment caused by the Project's overcrowding are based in fact and meet the low threshold requiring that an EIR be prepared for this Project. There are seismic, flood, PCB issues, asbestos issues, construction noise issues, residential noise issues, lead paint issues noted in the HUD Environmental Assessment but inadequately discussed to remove fair argument that the Project brings adverse environmental changes with it. The Project is likely built on bay fill that could liquefy during a seismic event. The foundation of the property in question is most likely not reinforced with rebar as this construction practice was not commonly performed in 1914. The Project is not 31 feet above sea level contrary to the assertion in the HUD Environmental Assessment. The elevation is probably just a few feet above sea level. This elevation places the Project in a flood zone regardless of the failure by a Federal Agency to map the flood zones in San Francisco. Considerable issues are not raised because the document was not prepared for CEQA purposes but rather for HUD that will be supplying millions of Federal dollars in funding were this Project to go forward.

The Mayor's Office of Housing purports to place 25 or so dwelling units with inadequate parking and inadequate common dining rooms and inadequate common kitchen and common room meeting facilities in the existing Edward II Hotel for at risk youth group housing with out patient substance abuse treatment programs (p.8 HUD assessment) on a single small lot of approximately 3100 square feet. The purpose of the Project is to provide housing for young adults who are either homeless or transitioning out of foster care. Proposed are about 24 dwelling units for the young adults and one for a staff person, a total of 25 dwelling units on a lot merely 3100 square feet in an area which is not zoned for such high density permanent residency and for such a use. Will the Project become a SRO hotel when the tenants cease being "at risk" youth but age into "at risk" adults? Locating out patient substance abuse treatment programs within the Project carries environmental impacts especially because the "at risk" youth may not fully participate in these programs in light of the fact the Project is not planned as a sober living facility.

No detailed construction drawings are available that indicates that the almost century old wood frame building can accommodate such high density of permanent residential occupants. The lack of detail suggests that the Lead Agency and the Developer are generating serious adverse environmental impacts and have made inadequate provisions to address these impacts. How are overcrowding effects to be mitigated in the building and around the building? Will there be cooking in the dwelling areas or bedroom rooms? How are the serious risks of fire from cooking and smoking in the rooms going to be managed by the architects of the Project? Will the building fail in an earthquake? Does the foundation need to be re-constructed?

The building is wood frame with narrow corridors according to the sketches provided. The building is almost 100 years old. With the proposed high density uses, where are the two hour fire doors and multiple hour fire walls that are needed to protect public health and safety of the occupants and reduce fire risks to the proposed tenants who will occupy the 25 small dwellings in the building? Where are the fire protections for the adjacent properties on Lombard and on Scott? How is the communal kitchen designed to manage the risks of fire? Where are the fire escapes? How will people in wheel chairs going to get out of the dwelling units of the second and third floor of the building given that the corridors were

designed almost a century ago? There are many indications from a review of the public documents relating to the Project that a fire trap is in the making. Certainly this fact alone requires an EIR.

The drawings prepared by Asian Neighborhood Design do not depict a Project lacking significant environmental impacts. Sheets marked A1.1 showing plan A and plan B do not depict a group living facility with a common kitchen and common meeting and dining spaces to be constructed to serve the residents. Both drawings sheets A and B show a small kitchen that is supposed to provide meals to the 25 or more residents and their guests. This common kitchen is a mere 115 square feet in the drawing. Where will the common laundry facilities be placed? There is no detail showing placement of proper and sanitary food preparation appliances: a commercial style stove, a large refrigerator, a walk in cool room, food storage facilities including large freezers, stove's smoke and grease hood, a commercial size dishwasher and dryer, sinks, storage for dry goods and implements. Because the plans prepared by Asian Neighborhood Design do not depict plans for common dining facilities, a common kitchen and common meeting rooms or living rooms to serve the special needs of the residents, the Project is clearly not "group housing" within the meaning of the city's Planning and Zoning Ordinance. The Project proponents contend to the contrary, but the limited drawings provided by the Project proponents reveal that no functional group housing facilities are planned for this Project. Rather, what is proposed are 25 dwelling units making the Project a potential SRO (Single Room Occupancy) Hotel. The Planning and Zoning ordinance limits residential density to 6 dwelling units on lots the size of the one in question. Nowhere is an SRO permitted in this zoning district.

Further, the drawings prepared by Asian Neighborhood Design do not show any ADA required elevators to serve the two upper floors. The lift suggested for the ground level is not ADA compliant for the Project. Additionally the drawings prepared by Asian Neighborhood Design do not show, depict or otherwise reveal the corridor dimensions on the second and third floors, the residential areas that would demonstrate the proposed Project is ADA compliant. Omitted from the public documents are detailed drawings for the bedrooms the in-room cooking facilities, and the sanitary facilities. How many showers, toilets and sinks are planned for the intended residents? Where are these to be located? How are the overcrowding conditions mitigated by good design that is consistent with the fire code and all of the applicable building codes? What are the sound insulation values between the floors and the bedrooms and what noise will enter the proposed Project from Highway 101?

Some of the time there will be 50 or more persons in this building because overnight guests are allowed. There are no restrictions on use of alcohol or other substances even though there is supposed to be "out-patient substance abuse treatment programs" in the facility according to p 8 of the Environmental Assessment. The building will house many young at risk adults and their guests, how many and when are variable numbers because the facility will permit occupancy by overnight guests. There are potential adverse environmental impacts associated with "out-patient substance abuse treatment programs" that might not occur were a sober environment model advanced by the Lead Agency.

There are unaddressed environmental issues related to the carbon gasses and particulate carbon from trucks and cars using Highway 101. The highway traffic is considerable and the atmospheric contamination from Lombard Street is significant. Where are the study and the planning documents

that have evaluated these risks? Such a study belongs in a thoughtful environmental impact report under CEQA.

Further, there has been no adequate treatment in any detail concerning the “Significance of Impacts” from Green House Gas Emissions. Section 15064.4 recently added to CEQA’s regulations requires consideration of the carbon gas issues generated and as a corollary resident’s exposure to the carbon gasses from Highway 101 and the particulate carbon from Highway 101 is matter of environmental health concern and environmental justice. Further, what measures are being taken to improve the air quality within the proposed development and to protect the proposed residents from the carbon particulates from the tens of thousands of diesel and gasoline engines that exhaust in front of the subject property? Merely replacing existing windows with sound dampening glass does not resolve the more serious environmental health issues arising from the placement of the high density public housing Project for permanent occupancy right on Lombard Street, Highway 101. Reducing the noise from Lombard Street does not reduce exposure to the known carcinogens found in exhaust from diesel trucks and gasoline passenger cars in the concentrations found at the southwest corner of Scott and Lombard. What is the exposure? What are the health risks? What are mitigation measures? Should public housing for young adults be located next to a major highway when it is known truck and car exhaust is damaging to health? Every gasoline pump in this State notes that liquid petroleum based fuels contain substances known to cause cancer. It is no secret that cumulative exposure to exhaust fumes and particulate carbon is a risk to health.

What measures have been taken under NEPA and CEQA to find alternative locations where there would be lower risks to the public and to the residents? Where are properties in the City of San Francisco that do not need special legislation to “erase” (by the use of the Special Use District) the parking and density restrictions of the City’s Planning and Zoning Code? NEPA and CEQA require the Public Agencies to evaluate alternate locations. Piecemeal approaches are not favored. The weighing of the alternatives is especially important in the present context. The public will be underwriting the Project in excess of \$10 million. The HUD assessment places the cost of the public housing project at \$11,239,000. (Page 1 Christopher A. Joseph Environmental Assessment) Estimates so far have included an incomplete cost figure of \$11.239 million for the project (which was recently corrected downward as a mistaken.) The Project figure is in the range of three times the purchase price of the property. Where are the calculations of the true cost of this proposed Project? What construction costs and project costs have been competently evaluated? The estimates are not provided in the public documents. This raises a fair issue in and of itself: what is the cost of the environmental measures that must be taken to assure a reasonable level of public safety in the proposed, overcrowded public housing Project? Other sites must be evaluated because the cost of environmental compliance will be lower in buildings more suited for the uses proposed than the Edward II hotel. Newer buildings located away from Highway 101, properly zoned, with adequate on site and off site parking and enough living space area must be considered. To date so far as this Project goes, this has not been done with a critical eye on constraining costs and serving the most young people with scant public dollars.

Assuming that 25 people, 24 young adults and 1 manager or staff person are each provided with dwelling units at a project cost of \$10,000,000 from public funding from federal and city sources, each dwelling unit will cost in the range of \$400,000. To this figure the cost of ADA upgrades elevators and

correct sized doors and corridors in the building (that are mandatory under existing law because federal funds are involved) and adding to this the fire walls, fire doors and upgraded fire sprinklers and fire exits, fire escapes, and proper venting, chimneys and flues for the cooking facilities in the two floors of apartments and in a properly sized common kitchen, common dining room and common meeting rooms on the first floor must be summed. These items will add considerable cost per dwelling unit. These costs have not been quantified or detailed properly by the City or the developer of the Project. There are serious questions that fair minded observers raise involving public safety effects that result from the overcrowding contemplated by the Project. There are no detailed estimates of the environmentally related construction costs needed to mitigate the overcrowding that the Lead Agency development plan contemplates for the Project.

There are no detailed plans and specifications in the public files. The drawings provided do not show compliance with the ADA, the Planning and Zoning Code, the applicable Fire Code, the San Francisco Building Code to name a few. Any expert opinion that the sketches and drawings provided are adequate to assess the environmental and public health risks is unquestionably and irrefutably incompetent because there is no colorable showing that the Project substantially conforms to applicable building, fire and planning and zoning codes.

It is more probable than not that the lead agency has under budgeted this Project. An allowance of 25% for overages caused by the above noted deficiencies may be reasonable. The cost per unit can be calculated to be \$500,000. Off street parking is needed as well. It is possible that each unit will need a parking place because special conditions will be required as part of any Special Use District because there are so many permanent dwelling units, 25, are sought for such a small lot. Even at \$100,000 per unit, this off street parking requirement would be difficult to deliver, given the location of the Project and the high cost of unimproved and vacant real estate within a few blocks of the Project and the high cost of construction of parking lots in San Francisco. My rough estimation shows that each unit could draw \$600,000 from the strained, scant public resources when safety, parking and fire requirements, San Francisco Building Code and ADA specifications are factored in properly. The price tag for the Project could exceed \$15,000,000. It would be less burdensome from an environmental standpoint to purchase a set of existing buildings that have parking and comply with the planning, zoning, and building codes.

The Lead Agency has not properly considered the purchase of suitable alternate property with parking and legal density for the Project's proposed tenants. One major failing of the process to date has been the exclusion from consideration of alternative properties that have proper habitation density and adequate parking in place. Because the selection process has overlooked cost benefit analysis, an EIR is required to protect the public interest and the interests of the taxpayers, not to mention to protect the environment from ill planned overcrowded public housing Projects.

The Project should study alternate locations and EIR would flesh out the details. The Project as detailed so far raises many fair arguments because it seeks an overconcentration of at risk youth in an SRO type environment. Page 5 of the Christopher Joseph & Associates Environmental Assessment notes that the lot is .78 acre and is merely 50 feet by 62 feet. The lot is only 3100 square feet. The density proposed is absolutely unreasonable for the size lot. The same page of the Environmental Assessment, page 5, notes that 5,000-8,000 people aged 16-24 are "not making a smooth transition to adulthood." Serving this

need with such a small property for so much public money for so few ought to raise serious questions (including environmental ones) because the cost is so high and so few can be served by the 3100 square foot lot. Certainly the high cost raises political economy issues along with standard environmental questions that need mitigation with this Project.

Related to the density issues are the parking issues. Interestingly, the purchase and sale agreement between the developer and the present owner does not convey any rights to off site parking presently owned by the sellers of the property. The existing tourist hotel use has some off site parking available to it. The Project is not receiving these rights as they are excluded from the purchase agreement. The documents and drawings provided make no provision for the scores of motor bikes motor cycles, cars and trucks the tenants and their guests will use. The same is true for the staff that will supposedly be in residence at the Project.

The Lead Agency seeks to circumvent density limitations and on site and off site parking requirements by enactment of a Special Use District. Simply put, the proposed development, the Project, is illegal under existing law. The City of San Francisco has requirements for onsite and offsite parking spaces for apartment buildings residences, group housing and all other types of dwelling units. The lack of parking provided by the Project provides an environmental effect which is immediately related to the Project. Where are the prospective tenants and staff going to park their transportation to go to work or to school? The impact of 20-40 or more motor cycles, cars, trucks etc on the local environment is a significant environmental impact that is not addressed by the documents in the Planning Department's file. Again, there is no provision for parking what so ever. Page 29 of the Environmental Assessment admits that the proposed Project does not conform to "Comprehensive Plans and Zoning". The Environmental Assessment does not properly report the number of units permissible for the project. 25 are sought. 6 are permitted as separate dwelling units. No plans and specifications were provided to show that the intended development is truly "group housing" which might allow additional dwelling units. Because of the elevated density proposed, there are direct physical changes which are caused by and are immediately related to the proposed Project. (CEQA Regulation Section 15064 (d) 1) "...For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people; the overcrowding would be regarded as a significant effect." (CEQA Regulation Section 15064 (e)). This regulation by itself requires the preparation of an EIR. The overcrowding causes an adverse effect on people. It is "significant" because of the language of this regulation.

There is no reasonable doubt that the Project as outlined in bare bone fashion in the Joseph Environmental Assessment and the other papers in the Project environmental file will overcrowd the proposed tenants in the existing building and the neighborhood will suffer the adverse environmental effects caused by the overcrowding because present Planning and Zoning Law must be ignored for this Project to go forward. What are the impacts on the tenants and the neighborhood that flow from the high density housing proposed? I contend that exceeding the number of units permitted from 6 to 25 is overcrowding and this is compounded by the lack of open space in the units, the lack of parking for the units, and the lack of common amenity features that might allow the Project to be considered group housing. This factual contention alone raises a fair argument that this proposed Project "may" have a significant effect on the environment.

The proposed Project is overcrowded because the Developer needs to have enough units for its investment offerings to “pencil out”. The resultant overcrowding burdens the tenants of the Project as well at the residential areas where the Project is located. Where are cars and motor bikes going to be parked? Where will the young adults congregate? Overcrowding is correlated with crime as well. The public housing project that is similar to the one proposed on Scott Street that is located on Larkin Street generates an abnormally high number of police calls and contacts. It is reasonable to anticipate that the typical “at risk” youth population from downtown will generate significant police calls and contacts when moved to the corner of Scott and Lombard. The risk to the environment caused by placing numerous unsupervised at risk youth in an overcrowded SRO type living situation raises significant environmental issues that need to be addressed in an EIR.

“...If a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant impact.” No Oil Inc. v City of Los Angeles (1974 13 Cal. 3d. 68)

The City and County of San Francisco is obliged to follow not only the CEQA regulations and statutes, but also the opinions of the Courts interpreting CEQA. Under the holding of the “No Oil” case, the City is obliged to prepare an EIR. In this matter there is no question that a complete EIR is required for the Project because of its overcrowding effects and the blatant violation of existing Planning and Zoning Ordinances. Here overcrowding is shown a significant environmental issue; the overcrowding generates serious risks of injury or death, it requires extensive mitigation costs, off site impacts to the vicinity caused by the high density development plan that is completely inconsistent with the Planning and Zoning Ordinances. The overcrowding issue is supported by facts, reasonable assumptions predicated on facts and expert opinion supported by the facts. (CEQA regulation section 15064 (e) (5).) Overcrowding that is unlawful under the Planning and Zoning Ordinances does not magically convert to permissible overcrowding were (and if) Special Use District legislation to be enacted for the single 3100 square foot lot in question allowing more than 6 dwelling units. Consequently, an EIR is required under CEQA.

The Lead Agency’s contemplated legislative ploy is no remedy to the overcrowding and does not change the environmental impacts of the proposed Project. Because the Project cannot go forward without the enactment of SUD, there is no basis in fact or reason or within any expert opinion that could opine based on the facts that the risks, dangers and impacts associated with overcrowding vanish because of the subsequent enactment of the SUD legislation.

The overcrowding issues are not resolved in the papers in the public file. Overcrowding generates risks of death or injury from fire in the Project, of communicable diseases, risks from traffic congestion from parking place competition on Highway 101 and slow down of highway traffic, risk of injury and death from accidents along Highway 101 caused by the lack of parking for cars, motor bikes, motor cycles trucks used by the tenants, risk of injury or death from overcrowded living conditions, risk of injury or death from fire caused by smoking or cooking in the rooms, risk of injury or death from fire from the 115 square foot “kitchen”, risk of injury or death from inadequate fire walls fire doors, sub code stairways

and corridors, inadequate fire escapes during an earthquake or fire. There are additional risks of injury or death to a handicapped persons visiting or residing in the premises with inadequate ADA protections.

This brief list illustrates some of the overcrowding perils associated with the Project. Without access to the detailed drawings, I can assert that more environmental risks will be revealed in the EIR process. These must be addressed. The material in the public file raises fair questions and reveals environmental impacts and the material in the public file effectively negates neither the overcrowding issues nor those associated with proximity to Highway 101.

The Lead Agency is to be guided when there is disagreement among the expert opinion by CEQA regulation section 15064 (g). Where the experts differ on the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare and EIR. I call the Planning Departments attention to the fact that the language of CEQA regulation section 15064(g) is mandatory.

In closing, there is need for a full environmental analysis of the Public Project, a well prepared and comprehensive Environmental Impact Report because of the overcrowding proposed impacts the Project and the environment near the Project. The risks of injury or death are City wide concerns and must be resolved formally by a comprehensive Environmental Impact Report.

Respectfully Yours,

-S-

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