

**CITY AND COUNTY OF SAN FRANCISCO
RECREATION AND PARK COMMISSION
RESOLUTION NUMBER 1210-001**

JOINT RESOLUTION WITH THE PLANNING COMMISSION TO AMEND THE SECTION 295 IMPLEMENTATION MEMO ADOPTED IN 1989 TO: (1) RAISE THE ABSOLUTE CUMULATIVE SHADOW LIMITS ON SEVEN PARK PROPERTIES (UNION SQUARE, ST. MARY'S SQUARE, PORTSMOUTH SQUARE, JUSTIN HERMAN PLAZA, MARITIME PLAZA, WILLIE "WOO WOO" WONG PLAYGROUND, AND BOEDDEKER PARK) THAT COULD BE SHADOWED BY DEVELOPMENT PURSUANT TO THE TRANSIT CENTER DISTRICT PLAN, AND (2) INCORPORATE ADDITIONAL QUALITATIVE CRITERIA FOR NINE PARKS (THE PREVIOUSLY LISTED SEVEN PARKS, PLUS WOH HEI YUEN PARK AND CHINESE RECREATION CENTER) THAT DESCRIBE THE QUANTITY, COVERAGE AREA, DURATION, TIMES OF DAY, AND TIMES OF YEAR OF NEW SHADOWS; AND TO ADOPT FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

PREAMBLE

Under Planning Code Section 295, adopted pursuant to the voters' approval of Proposition K in 1984, a building permit application for a project exceeding a height of 40 feet cannot be approved if there is any shadow impact on a property under the jurisdiction of the Recreation and Park Department, unless the Planning Commission, upon recommendation from the General Manager of the Recreation and Park Department, in consultation with the Recreation and Park Commission, makes a determination that the shadow impact will not be significant or adverse.

Planning Code Section 295 states that "The City Planning Commission and the Recreation and Park Commission, after a joint meeting, shall adopt criteria for the implementation of the provisions of this Section." The Commissions initially met on January 24, 1985 to discuss implementation of Proposition K and methods to analyze properties that could be shadowed by new development. As part of that hearing, the Commissions adopted a memorandum describing an analytical approach to this exercise (the "1985 Memo").

On February 7, 1989, the Recreation and Park Commission and the Planning Commission jointly adopted criteria establishing absolute cumulative limits ("ACLs") for additional shadows on fourteen parks (Planning Commission Resolution No. 11595), as described in a staff memorandum (the "1989 Memo"). The ACL for each park is expressed as a percentage of the Theoretically Available Annual Sunlight ("TAAS") on the park (with no adjacent structures present).

On May 26, 2012, the Planning Commission held a duly noticed public hearing and recommended approval of the Transit Center District Plan ("TCDP" or "Plan"), along with implementing ordinances, to the Board of Supervisors. The result of a multi-year public and cooperative interagency planning process that began in 2007, the Plan is a comprehensive vision for

shaping growth on the southern side of Downtown to respond to and support the construction of the new Transbay Transit Center project, including the Downtown Rail Extension. Implementation of the Plan would result in generation of up to \$590 million for public infrastructure, including over \$400 million for the Downtown Rail Extension. Adoption of the Plan included height reclassification of numerous parcels in the area to increase height limits, including a landmark tower site in front of the Transit Center with a height limit of 1,000 feet and several other nearby sites with height limits ranging from 600 to 850 feet.

On September 28, 2011, the Planning Department published a draft Environmental Impact Report (EIR) for the Plan for public review. The draft EIR was available for public comment until November 28, 2011. On November 3, 2011, the Planning Commission conducted a duly noticed public hearing at a regularly scheduled meeting to solicit comments regarding the draft EIR. On May 24, 2012, the Planning Department published a Comments and Responses document, responding to comments made regarding the draft EIR prepared for the Plan.

On May 24, 2012, the Planning Commission reviewed and considered the Final EIR and found that the contents of said report and the procedures through which the Final EIR was prepared, publicized, and reviewed complied with the California Environmental Quality Act (California Public Resources Code Sections 21000 et seq.) ("CEQA"), 14 California Code of Regulations Sections 15000 et seq. ("the CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code ("Chapter 31").

The Planning Commission also found the Final EIR was adequate, accurate and objective, reflected the independent analysis and judgment of the Planning Department and the Planning Commission, and that the summary of comments and responses contained no significant revisions to the draft EIR, and certified the Final EIR for the Plan in compliance with CEQA, the CEQA Guidelines and Chapter 31.

Before taking action on the TCDP Ordinances and other related actions, the Planning Commission on May 24, 2012, approved Motion No. 18629, adopting environmental findings in accordance with CEQA, including the rejection of alternatives and a statement of overriding benefits. As part of this action on May 24, 2012, the Planning Commission also adopted a Mitigation Monitoring and Reporting program ("MMRP") for the Plan and made mitigation measures conditions of its approval.

The Final EIR prepared for the Plan analyzed and identified potential new shadows that could be created cumulatively by likely development sites in the Plan area on up to nine open spaces (Union Square, Saint Mary's Square, Portsmouth Square, Justin Herman Plaza, Willie "Woo Woo" Wong Playground, Maritime Plaza, Who Hei Yuen Park, Chinese Recreation Center, and Boeddeker Park) that are under the jurisdiction of the Recreation & Park Department. Seven of these open spaces (Union Square, Saint Mary's Square, Portsmouth Square, Justin Herman Plaza, Willie "Woo Woo" Wong Playground, Maritime Plaza, and Boeddeker Park) were assigned ACLs in the 1989 Memo. Approval of these buildings would thus be subject to approval under the procedures of Planning Code Section 295 (also known as "Prop K") by the Recreation & Park and Planning Commissions.

On July 24, 2012, the Board of Supervisors held a duly noticed public hearing, affirmed certification of the Final EIR and approved the Plan, as well as the associated ordinances to implement the Plan, on first reading.

On July 31, 2012, the Board of Supervisors held a duly noticed public hearing, and approved the Plan, as well as the associated ordinances to implement the Plan, on final reading.

On August 8, 2012, Mayor Edwin Lee signed into law the ordinances approving and implementing the Plan, which subsequently became effective on September 7, 2012.

On October 11, 2012, the Planning Commission and the Recreation and Park Commission held a duly noticed joint public hearing to consider raising the absolute cumulative shadow limits for seven open spaces under the jurisdiction of the Recreation & Park Department that cumulatively could be shadowed by likely development sites in the Plan area.

The Planning Commission and the Recreation and Park Commission have reviewed and considered reports, studies, plans and other documents pertaining to the Plan.

The Planning Commission and the Recreation and Park Commission have heard and considered the testimony presented at the public hearing and has further considered the written materials and oral testimony presented on behalf of the Project Sponsor, Department staff, and other interested parties.

The Planning Department, Linda Avery, is the custodian of records for this action, and such records are located at 1650 Mission Street, Fourth Floor, San Francisco, California. The custodian of records for the Recreation and Park Department and Commission is Margaret McArthur. For the Recreation and Park Department and Commission actions, such records are located at 501 Stanyan Street, San Francisco, California.

Therefore, having reviewed the materials identified in the recitals above, and having heard all testimony and arguments, the Commissions find, conclude, and resolve as follows:

RESOLUTION

WHEREAS, Proposition K was adopted by the voters over 25 years ago in 1984, and codified as Planning Code Section 295 in 1985, with the general intent of preserving sunlight to open spaces under the jurisdiction of the Recreation and Park Department; and,

WHEREAS, Planning Code Section 295 required the Planning and Recreation and Park Commissions ("the Commissions") to jointly develop implementation criteria to ensure that shadows that would be adverse to the use of parks would not be created by new development. The Commissions jointly adopted a memorandum in 1989 (the "1989 Memo") that included quantitative and qualitative criteria and guidelines, including the adoption of Absolute Cumulative Shadow Limits ("ACLs") for 14 parks within the larger downtown area. These ACLs were established based on considerations of the existing shadow load of a park, size of the park, and other factors, including patterns and locations of future development consistent with existing plans whose implementation was in the public interest.

The Commissions also adopted qualitative factors to consider when determining whether an individual development project would have a significant adverse impact on use of such parks, based on the time of year, time of day, location, and duration of new shadows, and the effect of these shadows on usage patterns within parks; and,

WHEREAS, The Commissions recognized that they were vested with the administrative authority to establish criteria and guidelines governing shadow on parks as set forth in the 1989 Memo. Neither Proposition K nor Section 295 require the establishment of ACLs. They also do not mention any particular quantitative mechanism or require the adoption of such mechanism. However, the Planning and Recreation and Park Commissions decided jointly to create such limits in the 1989 Memo for certain parks in the downtown area in order to more deliberately manage the sunlight on parks in the densest part of the City, which was situated north of Market Street at the time; and,

WHEREAS, The ACLs are a creation of the joint action of the Commissions and are set forth in the 1989 Memo. The Commissions, under the authority delegated to them under Proposition K, have the ability to revise such limits from time to time in a manner they deem appropriate based on new information and experience, provided that the revisions are consistent with the mandate of Section 295 that no new shadows may be permitted which are adverse to the use of the parks; and,

WHEREAS, The Downtown Plan was adopted in 1985, after the adoption of Section 295, with the intention of shifting growth south of Market Street, particularly to the area around the Transbay Transit Center, in order to reduce development pressure north of Market Street, preserve historic buildings, and reduce the encroachment of the central business district into surrounding neighborhoods to the north and northwest; and,

WHEREAS, The Transit Center District Plan ("TCDP" or the "Plan") is a multi-year public and cooperative interagency planning process that began in 2007 which supports and builds on the 1985 Downtown Plan's vision for the area around the Transbay Transit Center as the heart of the new downtown. Specifically, the Plan is a comprehensive vision for shaping growth on the southern side of Downtown to respond to and support the construction of the new Transbay Transit Center project, including the Downtown Rail Extension; and,

WHEREAS, The TCDP is consistent with the overarching policy objectives of the 1985 Downtown Plan, but is a comprehensive revision and update to key aspects of the Downtown Plan based on today's considerations and how best to achieve the broadest improvements to livability, economic development, and sustainability; and,

WHEREAS, Adoption of the TCDP included reclassification of numerous parcels in the area to increase height limits and facilitate greater intensity and density for individual developments in furtherance of the goals of the Plan. These reclassifications include a landmark tower site in front of

the Transit Center with a height limit of 1,000 feet and several other nearby sites with height limits ranging from 600 to 850 feet; and,

WHEREAS, Each building proposed within the TCDP contributes to the Plan's overall program of public benefits, and the Plan cannot be reasonably evaluated for public interest on a building-by-building basis. The Plan's public benefit program would be obscured by a piecemeal evaluation of all the established ACLs as part of each individual building's approval process. Such an approach also would undermine the purposes of doing comprehensive planning for development, open space, and miscellaneous public benefits. As such, adjustments to the 1989 Memo should be considered holistically in light of the newly adopted TCDP; and,

WHEREAS, The 1989 Memo provides that the Planning Commission and Recreation and Park Commission may consider the public good served by development that would cast new shadows on park properties, in terms of a needed use, building design, and urban form. The adoption and implementation of the Plan is intended to shape regional growth patterns through the development of an intense, employment-focused neighborhood situated within downtown San Francisco in an area served by abundant existing and planned transportation infrastructure. As the tallest proposed building within both the City and the Plan area, the Transbay Tower, at over 1,000 feet in total height, would serve as the centerpiece of a new sculpted downtown skyline that marks the location of the Transbay Transit Center, the future nexus of local, regional, and statewide transportation infrastructure in San Francisco. The Transbay Tower will necessarily be flanked by nearby buildings of 600 to 850 feet in height in order to provide a graceful skyline and provide transitions to the Transbay Tower from the predominant existing skyline or 600 feet.

WHEREAS, The additional cumulative shadow that could be cast by development within the Plan area on Union Square, Portsmouth Square, Saint Mary's Square, Justin Herman Plaza, Maritime Plaza, Chinese Recreation Center, Boeddeker Park, Willie "Woo Woo" Wong Playground, and Who Hei Yuen Park is not expected to interfere with or adversely affect the use of these parks, for the following reasons: (1) the new shadow would primarily occur in the morning hours during periods of comparatively low park usage; (2) the new shadow would generally occur for a limited amount of time on any given day, with durations ranging from five minutes to a maximum of approximately 60 minutes, depending on the specific park and the time of year; and (3) the new shadow would occur during limited discrete periods of the year, which would vary depending on the specific park, and would range from a minimum of a couple weeks to a maximum of approximately three months, with fluctuations in the amount of new shadow that would be cast during these periods on a given park property. These considerations are consistent with the analytical criteria and guidelines in the 1989 Memo, which include qualitative criteria that recommend avoiding shadows that cover extensive areas of a park for a substantial length of time, particularly in areas and during times of intense usage; and,

WHEREAS, Development within the Plan area will generate substantial revenue for new infrastructure and improvements to the public realm, including the creation of new open spaces. Implementation of the Plan, if all major development sites are constructed, would generate up to \$590

million for public infrastructure, including over \$400 million for the Downtown Rail Extension. This contribution of funds to the Downtown Rail Extension represents the vast majority of the City 's commitment to provide \$450 million, memorialized in a regional agreement with the Metropolitan Transportation Commission to leverage \$2 billion in additional regional and federal funds to construct the rail project; and,

WHEREAS, The Plan would create or help fund the creation of over 12 acres of new public open space in the Plan Area, which currently has no publicly-owned open space. The 1989 Memo considered the importance of distributing sunny open spaces throughout the larger Downtown area. However, the Memo primarily focused on open spaces north of Market Street, and did not contemplate the creation the type of extensive new public open space proposed by the Plan; and,

WHEREAS, A portion of the projected revenues from implementation of the Plan are allocated to improvements outside of the Plan area, in recognition that increased population in the Plan area would have outward rippling effects on usage and demand for open space in nearby neighborhoods. The Funding Program for the Plan specifically provides for up to \$12.5 million from the Plan's future Open Space Fee revenue to fund open space improvements outside of the Plan area, including \$9 million for open space improvements in the Chinatown area and \$3.5 million for other downtown area open space improvements; and,

WHEREAS, The 1989 Memo did not establish an ACL for either WohHei Yuen Park or the Chinese Recreation Center; and,

WHEREAS, A determination by the Commissions to raise the ACLs for the seven specified parks in amounts that would accommodate the additional shadow that could be cast by development within the Plan area as reported in the Plan's FEIR does not constitute an approval of any specific project. Through future action at public hearings, the Planning Commission, and Recreation and Park Commission (if it so desires), would analyze and consider the shadow impacts of individual development projects within the Plan area, and determine whether a given project would result in an adverse shadow impact on open spaces regulated by Section 295 and allocate available shadow to that project; and

WHEREAS, CEQA Guidelines Sections 15162 and 15163 require a lead agency to prepare a subsequent EIR or a supplement to an EIR when substantial changes to the project, substantial changes with respect to the circumstances under which the project would be undertaken, or new information of substantial importance would require major revisions of the certified EIR. There have been no substantial changes to the TCDP, no substantial changes in circumstances, and no new information of substantial importance since the Final EIR was certified on May 24, 2012. Therefore, no subsequent or supplemental environmental review is required.

DECISION

Now, therefore be it

RESOLVED, That based upon the Record and the submissions by the staff of the Planning Department, the Planning Commission and Recreation and Park Commission hereby amend the 1989 Memo to increase the Absolute Cumulative Shadow Limits ("ACLs") for the following specified properties under the jurisdiction of the Recreation and Park Department, as specified below:

Open Space	Current Available ACL	Cumulative Plan Shadow	Proposed ACL Increase	Total ACL after Proposed Increase	Transbay Tower Shadow	Remaining ACL After Transbay Tower Allocation
Union Square	0.080%	0.190%	0.110%	0.190%	0.011%	0.179%
St. Mary's Square	0%	0.090%	0.090%	0.090%	0.048%	0.042%
Portsmouth Square	0%	0.410%	0.410%	0.410%	0.133%	0.277%
Justin Herman Plaza	0.007%	0.090%	0.083%	0.090%	0.046%	0.044%
Willie "Woo Woo" Wong Playground	0%	0.030%	0.030%	0.030%	N/A	0.030%
Maritime Plaza	0%	0.004%	0.004%	0.004%	0.004%	0%
Woh Hei Yuen Park	N/A	0.001%	N/A	N/A	0.001%	N/A
Chinese Recreation Center	N/A	0.008%	N/A	N/A	0.008%	N/A
Boedekker Park	0%	0.003%	0.003%	0.003%	0.003%	0%

BE IT FURTHER RESOLVED THAT, The increases in the ACLs specified by this resolution are limited to the general shadow profiles of the cumulative new shadows that could be cast by buildings within the Transit Center District Plan, as identified in the FEIR prepared for the Plan and would not be available for buildings outside the plan.

BE IT FURTHER RESOLVED THAT, The increases in the ACLs specified by this resolution are accompanied by additional qualitative and quantitative criteria for the characteristics of potential shadows within these ACLs, including the duration, time of day, time of year, and location of shadows on the particular parks, as described in the Plan Final EIR and attached to this Resolution as Exhibit A. Any future consideration of allocation of "shadow" within these newly increased ACLs for projects must be consistent with these the criteria set forth in Exhibit A.

BE IT FURTHER RESOLVED THAT, The "public benefit" of any project considered for allocation of new shadow within these revised ACLs shall be considered in the context of the public benefits of the Transit Center District Plan as a whole, provided that such project is within the Plan area.

BE IT FURTHER RESOLVED THAT, Any development project that seeks allocation of available ACL within the limits newly established herein must adequately demonstrate a good faith effort to sculpt the massing and architectural elements of the proposed building so that it: (1) is consistent with the adopted building height limits and controls in the Plan, and (2) reduces the effect of the building's

shadows on the parks protected by Section 295 in comparison to the building's shadow as analyzed in the Plan's Final EIR. This requirement shall not apply to the Transbay Tower (101 1st Street) project, however, which was analyzed at a project level in the Final EIR.

BE IT FURTHER RESOLVED THAT, The Planning Commission and Recreation and Park Commission, for purposes of this action, rely upon and incorporate by reference as though fully set forth herein, the findings, including a Mitigation, Monitoring, and Reporting Program, set forth in Exhibit B of this Motion as approved by the Planning Commission on May 24, 2012 in Motion No. 18629("CEQA Findings") and attached hereto as Exhibit B.

I hereby certify that the foregoing Resolution was ADOPTED by the Recreation and Park Commission at its meeting on October 11, 2012



Margaret McArthur
Commission Secretary

AYES: 6

NAYS: 0

RECUSED: 1

ADOPTED: October 11, 2012

EXHIBIT A

Additional Criteria for the Consideration of New Shadows on Certain Parks

The qualitative and quantitative criteria for each of the listed parks below shall supplement any evaluation criteria in the 1989 Memo. Times of day given for new shading should be considered approximate, with tolerance for consideration plus or minus 10 minutes. The "maximum coverage" criteria refers to the maximum coverage of new shading at the minute of greatest new shading.

Union Square

Existing Shadow Load:	38.3%. *
Revised ACL:	0.19%
Time/Date of Net New Shadow:	Mid-March through Late September
Maximum Duration of Net New Shadow:	60 minutes
Time of Day:	Between 7:10 – 8:40 am; On Day of Maximum extent: 7:40 – 8:40am
Maximum coverage of new shading:	24.5% of the park

Net new shadow may sweep across various parts of the park depending on the time of year, however the shadows at times of maximum extent would occur in the southern edge of the park, on the terraced steps, garage driveway, and adjacent landscaping and circulation areas. The maximum area of new shadow shall not exceed approximately 24.5% of the park at 8:00am in early April and early September. Shading on these particular days would begin at 7:40am at the southwest corner part of the park, peak at 8:00am, and depart by 8:40am.

** After the adoption of the ACL in the 1989 Memo, the Macy's expansion project added sunlight to Union Square amounting to approximately 0.05% of the theoretically available sunlight on the park. It should be noted, however, that the ACL for Union Square was not formally increased to account for this added sunlight.*

Portsmouth Square

Existing Shadow Load:	39.0%.
Revised ACL:	0.41%
Time/Date of Net New Shadow:	Late-October to Mid-February
Maximum Duration of Net New Shadow:	60 minutes
Time of Day:	Between 8:00 – 9:10 am;

Maximum coverage of new shading: On Day of Maximum Extent: 8:00 – 9:00am
42.5% of the park

The net new shadow would sweep across various parts of the park depending on the time of year, however the shadows at times of maximum extent would occur over the southwestern half of the park, on the upper plaza and the playgrounds. The maximum area of new shadow is 42.5% of the park at 8:30am in late November and mid-January. The shading on these particular days would begin at 8:00am at the center of the park, peak at 8:30am, and depart by 9:00am.

St. Mary's Square

Existing Shadow Load: 51.9%.
Revised ACL: 0.09%
Time/Date of Net New Shadow: Mid-September to mid-October, late February to late March
Maximum Duration of Net New Shadow: 40 minutes
Time of Day: Between 8:10 – 9:10 am;
On Day of Maximum Extent: 8:30 – 9:10am
Maximum coverage of new shading: 26.3% of the park

The net new shadow would sweep across various parts of the park depending on the time of year, however the shadows at times of maximum extent would occur over the southwestern half of the park, on the upper plaza and the playgrounds. The maximum area of new shadow is 26.3% of the park at 8:45am in late September and mid-March. The shading on these particular days would begin at 8:30am at the southwest of the park, peak at 8:45am, and depart by 9:10am.

Justin Herman Plaza

Existing Shadow Load: 37.6%.
Potential TCDP Net New Shadow: 0.09%
Time/Date of Net New Shadow: Early November - Early February
Maximum Duration of Net New Shadow: 60 minutes total (coverage from different buildings at discrete times, each with a duration of approximately 30 minutes)
Time of Day: Between 1:00 – 2:40 pm;
On Day of Maximum Extent: 1:10 – 1:40pm
and 2:10 – 2:40pm
Maximum coverage of new shading: 10.1% of the park

The net new shadow would sweep across various parts of the park depending on the time of day; however, the shadows at times of maximum extent would occur over the southern portion of the sunken plaza, including part of the stage, the steps along the edge of the plaza, and small portions of the landscaping and palm trees along the eastern and southern edges of the sunken plaza. No new

shading would be cast on the southern portion of the park south of the Market Street extension. The maximum area of new shadow is 10.1% of the park at 1:15pm in early December and early January. The shading on these particular days would begin at 1:10pm on the southern part of the sunken plaza in the northern part of the park, peak at 1:15pm, and depart by 1:40pm, then reappear at 2:10pm over the Market Street extension and disappear by 2:40pm. The two distinct periods are due to shading from different buildings occurring at different times.

Willie “Woo Woo” Wong Playground

Existing Shadow Load:	52.8%.
Revised ACL:	0.03%
Time/Date of Net New Shadow:	Early November - Early December; January
Maximum Duration of Net New Shadow:	20 minutes
Time of Day:	Between 8:00 – 8:20 am; On Day of Maximum Extent: 8:00 – 8:20am
Maximum coverage of new shading:	15.1% of the park

The net new shadow would sweep primarily over portions of the southern sport court and the children’s play area along the Sacramento Street edge between 8:00-8:20. The maximum area of new shadow is 15.1% of the park at 8:15 in late November and mid-January.

Maritime Plaza

Existing Shadow Load:	68.4%.
Revised ACL:	0.004%
Time/Date of Net New Shadow:	Early to Mid-December; - Late December to Early January
Maximum Duration of Net New Shadow:	25 minutes
Time of Day:	Between 10:40 – 11:05 am; On Day of Maximum Extent: 10:40 – 11:05 am
Maximum coverage of new shading:	1.9% of the park

The shadow falls on the southern portion of a skinny and long north-south slice of sun that tracks across the western half of the plaza in the morning as the shading building lines up with the gap between Embarcadero Center towers. The area features circulation, landscaping, sculpture, and informal seating areas. The maximum area of new shadow is 1.9% of the park at 10:45am in late December.

Chinese Recreation Center

ACL:	N/A
Time/Date of Net New Shadow:	Mid October; Mid February

Duration of Net New Shadow:	5 minutes
Time of Day:	8:25am
	On Day of Maximum Extent: 8:25am
Maximum coverage of new shading:	36.5% of the park

The shadow would predominantly fall on a portion of the roof of the Recreation Center building and a northern portion of the adjacent open recreation area.

Boeddeker Park

Existing Shadow Load:	37.7%
Revised ACL:	0.003%
Time/Date of Net New Shadow:	Early June – Early July
Duration of Net New Shadow:	5 minutes
Time of Day:	6:47 – 7:00 am
	On Day of Maximum Extent: 6:47 – 6:52am
Maximum coverage of new shading:	2.9% of the park

The shadow would fall in two locations, both on small portions of the outer street edges of the park, one along the Jones Street edge and one on the Ellis Street edge. In both cases, the shadow would fall on service entries and raised planters, based on the proposed design for the park renovation. The shadow would not touch any of the proposed active or passive recreational areas.

WohHei Yuen Park

Existing Shadow Load:	Unknown
ACL:	N/A
Time/Date of Net New Shadow:	Early November; Early February
Duration of Net New Shadow:	<10 minutes
Time of Day:	7:44-7:50am
	On Day of Maximum Extent: 7:44-7:50am
Maximum coverage of new shading:	1.9% of the park

The shadow falls on the John Street edge touching a small part of the plaza and part of the picnic table area beneath the arbor, and a part of the western portion of the park.