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January 5, 2022

Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
BOS.Legislation@sfgov.org

Re: Appeal of Planning Commission's CEQA Exemption Determination – 2000 Oakdale Avenue – 2021-004141DRP Submitted on Behalf of Requestor Libkra Investment Corp.

Dear Board President Walton and Members of the Board of Supervisors,

Pursuant to City/County of San Fransico Code § Section 31.16(e), I, Michael Lozeau on behalf of Libkra Investments Corp. ("Libkra") (collectively "Appellants") hereby appeal to the City/County's Board of Supervisors the recent CEQA Exemption Determination by the City/County of San Francisco's Planning Department dated December 9, 2021, for the proposed cannabis facility at 2000 Oakdale Avenue (the "Project"). On December 9, 2021, the Planning Commission denied Libkra's request for discretionary review of the Project and approved the Project. This appeal of the CEQA exemption is timely filed within 30 calendar days of that identified approval action.

Appellants are appealing this decision for the reasons described in the November 30, 2021, comment letter, and its attachment as well as the September 24, 2021 Request for Discretionary Review attached hereto as Exhibit A and B.

The Planning Department is relying on a Common Sense Exemption pursuant to CEQA Guidelines section 15061(b)(3). Section 15061(b)(3) provides:

> The activity is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

14 Cal. Code Regs. § 15061. However, no odor control management plan for the Project has been prepared and air quality and odor expert Francis Offermann, PE, CIH submitted substantial evidence identifying a likelihood that the Project will have odor impacts on the surrounding neighborhood. *See* Exhibit B. Because this substantial evidence shows that there is a possibility of significant odor effects from the Project, the City cannot rely on the Common Sense Exemption.

Appellants request that the Board of Supervisors vacate the Planning Department's CEQA exemption determination and remand this Project back to the Planning Department to prepare a mitigated negative declaration or, if necessary, environmental impact report.

Sincerely,

Michael Lozeau
Lozeau Drury LLP
On behalf of Libkra Investment Corp.

Encls.

EXHIBIT A

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November 30, 2021

Michael Christensen
Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Michael.Christensen@sfgov.org
commissions.secretary@sfgov.org

Re: Request for Discretionary Review – 2000 Oakdale Avenue – 2021-004141DRP
Additional Hearing Materials Submitted on Behalf of Requestor Libkra Investment Corp.

Dear Mr. Christensen and Planning Commissioners,

The following comments and the attached review by air quality and odor expert Francis Offermann, PE, CIH, are submitted on behalf of Discretionary Review Requestor Libkra Investments Corp. ("Libkra"). In addition to the concerns expressed in Libkra's application for discretionary review and the accompany declaration provided by Libkra's president, Mr. Knut Akseth, Mr. Offermann's review corroborates the likelihood of significant odor impacts from the proposed cannabis facility at 2000 Oakdale Avenue and the need for a clear odor control plan subject to neighbor and Commission review. To date, the applicant has not submitted an odor control plan for the proposed facility. (*See* Police Code, Art. 16, §1609(b)(11).) As a result, Planning staff has no information regarding whether appropriate odor control equipment will be installed and maintained "to prevent any significant noxious or offensive odors from escaping the Premises." (*Id*., Art. 16, §1618(v).)

As Mr. Offermann's review points out, specific measures are necessary to ensure no odors escape the facility that may adversely affect adjacent properties. The necessary measures must be evaluated prior to the issuance of any building permit because their effective and efficient implementation must be incorporated into the facility's design, including among other details, installation of carbon filters with sufficient filtering capacity on the facility's air exhaust equipment, measures to maintain negative air pressure in the rooms where odor sources will be present, and the provision of automatic closing doors. Because of the absence of any meaningful information on the facility's odor control plan, discretionary review of the project is required in order to consider the odor control conditions that will be necessary to apply to the facility to ensure that it does not introduce odors into the adjacent neighborhood.

In addition to the mechanical, maintenance and training features Mr. Offermann identifies, Libkra also believes the following measures must be included to ensure the facility's odor control equipment and measures are in fact working and to provide neighboring properties a process to trigger prompt responses to odor complaints. These measures include:

a. Post clearly visible signage on the exterior of the premises facing Oakdale Avenue and Rankin Street providing a phone number and e-mail address where persons who experience perceptible odors at or adjacent to the premises can report any odor complaint to 2000 Oakdale.

b. 2000 Oakdale shall maintain a log of all odor complaints received for the facility, including the date, time, name (if any) of the complainant, odor location, description of the nature of the odor complaint with as much detail as possible, the name of the 2000 Oakdale staff who did the intake of the complaint, the name of the 2000 Oakdale staff or agent that followed up on the complaint, and a detailed description of the steps taken by 2000 Oakdale to respond to the complaint, including steps to confirm the presence of any odor outside the facility, actions to eliminate the source of the odor, and actions to immediately reduce and eliminate any ongoing odor outside of the facility.

c. Upon receipt of any complaint of perceptible odor at or near the premises, 2000 Oakdale shall take the following actions:

    i. 2000 Oakdale shall immediately evaluate whether detectable odors are present immediately outside all exterior entrances and exhaust vents.

    ii. 2000 Oakdale shall immediately determine whether the source is from the facility or any person in the vicinity of the facility. If the odor source is a person, 2000 Oakdale shall take steps to have that person removed from the premises or adjacent areas. If the odor source is associated with the facility, 2000 Oakdale shall take immediate steps to abate the odor and identify any shortcoming in the facilities odor management system. 2000 Oakdale shall describe in writing each of the steps it took to respond to any odor complaint and make that written response available to the complainant within 48 hours of receipt of the complaint.

d. 2000 Oakdale shall make all reasonable efforts to prohibit the illegal sale and consumption of any controlled substances, dangerous drugs, or alcohol on neighboring premises and adjacent sidewalks and streets, including the intersection of Oakdale Avenue and Rankin Street, Rankin Street between Oakdale Avenue and Newcomb Avenue, and the premises and sidewalks of 1980 Oakdale Avenue along Oakdale Avenue, Rankin Street and Newcomb Avenue.

e. 2000 Oakdale shall provide the owner of 1980 Oakdale Avenue a sufficient number of "No Smoking" and "No Consuming Cannabis" signage to post the exterior of the 1980 Oakdale Avenue along Oakdale Avenue, Rankin Street and Newcomb Avenue.

f. Any and all logs required herein shall, upon demand of the owner or tenants of 1980 Oakdale Avenue or other adjacent properties, be made available for inspection and copying.

The Planning Commission should grant discretionary review in order to allow community members and the Commission to evaluate the terms of the facility's odor control plan prior to approving any building or other permits for the project and for the Commission to establish the

necessary mitigation measures to control any new introduction of cannabis odors to the neighborhood surrounding the project. Libkra looks forward to discussing these concerns with the Commission at the upcoming hearing scheduled for December 9, 2021.

Sincerely,

Michael Lozeau
Lozeau Drury LLP
On behalf of Libkra Investment Corp.

Encls.

ATTACHMENT

IEE INDOOR ENVIRONMENTAL ENGINEERING IEE
1448 Pine Street, Suite 103 San Francisco, California 94109
Telephone: (415) 567-7700
E-mail: offermann@IEE-SF.com
http://www.iee-sf.com

Date: November 24, 2019

To: Michael Lozeau

From: Bud Offermann PE CIH

Subject: Cannabis Odor Control; 2000 Oakdale, San Francisco, CA

Pages: 3

I have review the proposed cannabis production and retail facility located at 2000 Oakdale, San Francisco, CA, and my expert opinion is that if adequate odor mitigation measures are not incorporated into the design and operation of the facility, there will be significant odors introduced into the surrounding ambient air.

Cannabis does not need to be smoked to produce odors. Growing, curing, and dried cannabis all produce large amounts of volatile organic compounds with low odor thresholds, including nonanal, decanol, o-cymene, isobutyraldehyde, 1-chloroacetophenone, nerol, propylamine, o-guaiacol, linalyl acetate, methyl, anthranilate, benzaldehyde, and limonene (Rice and Koziel, 2015).

I am an indoor air scientist and engineer with 40 years of experience in measuring indoor air quality and odors, and designing mitigation measures, including those related to cannabis odors.

The following are my recommendations for controlling cannabis odors from being released from the proposed cannabis production and retail facility located at 2000 Oakdale, San Francisco, CA.

For each room with any unpackaged cannabis or cannabis in packaging that is not odor tight (e.g. Cannabis Processing and Receiving Area, Cannabis Product Storage, etc.) the following odor mitigation measures shall be established.

1.) Doors to the room will have automatic door closers that close the door within 3 seconds. Daily door openings shall be kept to a minimum.

2.) Air shall be exhausted from the room to maintain a minimum negative air pressure of 0.02 inches of water with respect to the adjacent spaces at all times that the door is closed and cannabis odors are present in the room. An air pressure sensor shall be mounted in the room capable of displaying the negative air pressure inside and outside of the room. If the exhaust fan is not operated continuously (i.e., 24 hours per day, 7 days per week), then the exhaust fan will be operated at all times there is unpackaged cannabis or cannabis in packaging that is not odor tight and continue for a minimum of 5 air changes following the sealing of all unpackaged cannabis or cannabis in packaging that is not odor tight into odor tight containers, or until such time there is no detectible cannabis odor in the room.

3.) The exhaust air from the room shall pass through an activated charcoal filter before being exhausted outdoors, such that the contact time through the media (i.e., thickness of activated charcoal packed bed divided by the airflow rate) is no less than 0.06 seconds. The selected activated carbon and design contact time shall be such that no perceptible cannabis odor is detectable from the exhaust air at the discharge point into the outdoor air with the maximum cannabis odor is present in the room.

4.) In each room operate during periods that cannabis is unpackaged, or in packaging that is not odor tight, operate an air purifier with an activated carbon filter such that a minimum of six air changes per hour is delivered to the room.

5.) Odor Log. A written daily log of the presence of cannabis odor at each of the facilities entrances and at each of the exhaust air discharge points into the outdoor shall be conducted by a trained staff person during the time which the maximum cannabis odor is present in the room. The written daily log shall contain the date, time, location of odor measurement,

and the name of the staff person conducting the odor assessment. If cannabis odor is detected, then all unpackaged cannabis or cannabis in packaging that is not odor tight will be immediately placed into odor tight containers until such time as the cause of the odor is corrected (e.g., changing the activated charcoal filter, adjusting the airflow rate through the air activated charcoal filter, increasing the negative air pressure in the room etc.). The written daily logs shall be kept on site for a minimum of 5 years.

6.) Maintenance. Prepare a maintenance schedule for the exhaust fans, activated charcoal filters, and automatic door closers. All maintenance activities, shall be documented in logs identifying the maintenance activity, the date of the maintenance activity, and the person carrying out the activity.

7.) Training. Prepare a training schedule for staff. The staff training program shall include, but not be limited to, the following:

- The terms of the facility's Good Neighbor Policy
- How different odor control tools, equipment and products work
- Safety concerns related to odor control
- Mastering effective odor control strategies
- Odor system maintenance
- Maintaining records for the odor management system
- Strategies to actively reduce odor
- Reporting issues to management

A log of all training events shall be maintained including but not limited to the date of the training activity, name of trainer, names of persons attending, and training topic.

References

Rice, S, and Koziel J. 2015. Characterizing the Smell of Marijuana by Odor Impact of Volatile Compounds: An Application of Simultaneous Chemical and Sensory Analysis

Francis (Bud) J. Offermann III PE, CIH

Indoor Environmental Engineering
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Education

M.S. Mechanical Engineering (1985)
Stanford University, Stanford, CA.

Graduate Studies in Air Pollution Monitoring and Control (1980)
University of California, Berkeley, CA.

B.S. in Mechanical Engineering (1976)
Rensselaer Polytechnic Institute, Troy, N.Y.

Professional Experience

President: Indoor Environmental Engineering, San Francisco, CA. December, 1981 - present.

Direct team of environmental scientists, chemists, and mechanical engineers in conducting State and Federal research regarding indoor air quality instrumentation development, building air quality field studies, ventilation and air cleaning performance measurements, and chemical emission rate testing.

Provide design side input to architects regarding selection of building materials and ventilation system components to ensure a high quality indoor environment.

Direct Indoor Air Quality Consulting Team for the winning design proposal for the new State of Washington Ecology Department building.

Develop a full-scale ventilation test facility for measuring the performance of air diffusers; ASHRAE 129, Air Change Effectiveness, and ASHRAE 113, Air Diffusion Performance Index.

Develop a chemical emission rate testing laboratory for measuring the chemical emissions from building materials, furnishings, and equipment.

Principle Investigator of the California New Homes Study (2005-2007). Measured ventilation and indoor air quality in 108 new single family detached homes in northern and southern California.

Develop and teach IAQ professional development workshops to building owners, managers, hygienists, and engineers.

Air Pollution Engineer: Earth Metrics Inc., Burlingame, CA, October, 1985 to March, 1987.

Responsible for development of an air pollution laboratory including installation a forced choice olfactometer, tracer gas electron capture chromatograph, and associated calibration facilities. Field team leader for studies of fugitive odor emissions from sewage treatment plants, entrainment of fume hood exhausts into computer chip fabrication rooms, and indoor air quality investigations.

Staff Scientist: Building Ventilation and Indoor Air Quality Program, Energy and Environment Division, Lawrence Berkeley Laboratory, Berkeley, CA. January, 1980 to August, 1984.

Deputy project leader for the Control Techniques group; responsible for laboratory and field studies aimed at evaluating the performance of indoor air pollutant control strategies (i.e. ventilation, filtration, precipitation, absorption, adsorption, and source control).

Coordinated field and laboratory studies of air-to-air heat exchangers including evaluation of thermal performance, ventilation efficiency, cross-stream contaminant transfer, and the effects of freezing/defrosting.

Developed an *in situ* test protocol for evaluating the performance of air cleaning systems and introduced the concept of effective cleaning rate (ECR) also known as the Clean Air Delivery Rate (CADR).

Coordinated laboratory studies of portable and ducted air cleaning systems and their effect on indoor concentrations of respirable particles and radon progeny.

Co-designed an automated instrument system for measuring residential ventilation rates and radon concentrations.

Designed hardware and software for a multi-channel automated data acquisition system used to evaluate the performance of air-to-air heat transfer equipment.

Assistant Chief Engineer: Alta Bates Hospital, Berkeley, CA, October, 1979 to January, 1980.

Responsible for energy management projects involving installation of power factor correction capacitors on large inductive electrical devices and installation of steam meters on physical plant steam lines. Member of Local 39, International Union of Operating Engineers.

Manufacturing Engineer: American Precision Industries, Buffalo, NY, October, 1977 to October, 1979.

Responsible for reorganizing the manufacturing procedures regarding production of shell and tube heat exchangers. Designed customized automatic assembly, welding, and testing equipment. Designed a large paint spray booth. Prepared economic studies justifying new equipment purchases. Safety Director.

Project Engineer: Arcata Graphics, Buffalo, N.Y. June, 1976 to October, 1977.

Responsible for the design and installation of a bulk ink storage and distribution system and high speed automatic counting and marking equipment. Also coordinated material handling studies which led to the purchase and installation of new equipment.

PROFESSIONAL ORGANIZATION MEMBERSHIP

American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE)

- Chairman of SPC-145P, Standards Project Committee - Test Method for Assessing the Performance of Gas Phase Air Cleaning Equipment (1991-1992)
- Member SPC-129P, Standards Project Committee - Test Method for Ventilation Effectiveness (1986-97)
  - Member of Drafting Committee
- Member Environmental Health Committee (1992-1994, 1997-2001, 2007-2010)
  - Chairman of EHC Research Subcommittee
  - Member of Man Made Mineral Fiber Position Paper Subcommittee
  - Member of the IAQ Position Paper Committee
  - Member of the Legionella Position Paper Committee
  - Member of the Limiting Indoor Mold and Dampness in Buildings Position Paper Committee
- Member SSPC-62, Standing Standards Project Committee - Ventilation for Acceptable Indoor Air Quality (1992 to 2000)
  - Chairman of Source Control and Air Cleaning Subcommittee
- Chairman of TC-4.10, Indoor Environmental Modeling (1988-92)
  - Member of Research Subcommittee
- Chairman of TC-2.3, Gaseous Air Contaminants and Control Equipment (1989-92)
  - Member of Research Subcommittee

American Society for Testing and Materials (ASTM)

- D-22 Sampling and Analysis of Atmospheres
  - Member of Indoor Air Quality Subcommittee
- E-06 Performance of Building Constructions

American Board of Industrial Hygiene (ABIH)

American Conference of Governmental Industrial Hygienists (ACGIH)

- Bioaerosols Committee (2007-2013)

American Industrial Hygiene Association (AIHA)

Cal-OSHA Indoor Air Quality Advisory Committee

International Society of Indoor Air Quality and Climate (ISIAQ)

- Co-Chairman of Task Force on HVAC Hygiene

U. S. Green Building Council (USGBC)
- Member of the IEQ Technical Advisory Group (2007-2009)
- Member of the IAQ Performance Testing Work Group (2010-2012)

Western Construction Consultants (WESTCON)

PROFESSIONAL CREDENTIALS

Licensed Professional Engineer - Mechanical Engineering

Certified Industrial Hygienist - American Board of Industrial Hygienists

SCIENTIFIC MEETINGS AND SYMPOSIA

Biological Contamination, Diagnosis, and Mitigation, Indoor Air'90, Toronto, Canada, August, 1990.

Models for Predicting Air Quality, Indoor Air'90, Toronto, Canada, August, 1990.

Microbes in Building Materials and Systems, Indoor Air '93, Helsinki, Finland, July, 1993.

Microorganisms in Indoor Air Assessment and Evaluation of Health Effects and Probable Causes, Walnut Creek, CA, February 27, 1997.

Controlling Microbial Moisture Problems in Buildings, Walnut Creek, CA, February 27, 1997.

Scientific Advisory Committee, Roomvent 98, 6th International Conference on Air Distribution in Rooms, KTH, Stockholm, Sweden, June 14-17, 1998.

Moisture and Mould, Indoor Air '99, Edinburgh, Scotland, August, 1999.

Ventilation Modeling and Simulation, Indoor Air '99, Edinburgh, Scotland, August, 1999.

Microbial Growth in Materials, Healthy Buildings 2000, Espoo, Finland, August, 2000.

Co-Chair, Bioaerosols X- Exposures in Residences, Indoor Air 2002, Monterey, CA, July 2002.

Healthy Indoor Environments, Anaheim, CA, April 2003.

Chair, Environmental Tobacco Smoke in Multi-Family Homes, Indoor Air 2008, Copenhagen, Denmark, July 2008.

Co-Chair, ISIAQ Task Force Workshop; HVAC Hygiene, Indoor Air 2002, Monterey, CA, July 2002.

Chair, ETS in Multi-Family Housing: Exposures, Controls, and Legalities Forum, Healthy Buildings 2009, Syracuse, CA, September 14, 2009.

Chair, Energy Conservation and IAQ in Residences Workshop, Indoor Air 2011, Austin, TX, June 6, 2011.

Chair, Electronic Cigarettes: Chemical Emissions and Exposures Colloquium, Indoor Air 2016, Ghent, Belgium, July 4, 2016.

SPECIAL CONSULTATION

Provide consultation to the American Home Appliance Manufacturers on the development of a standard for testing portable air cleaners, AHAM Standard AC-1.

Served as an expert witness and special consultant for the U.S. Federal Trade Commission regarding the performance claims found in advertisements of portable air cleaners and residential furnace filters.

Conducted a forensic investigation for a San Mateo, CA pro se defendant, regarding an alleged homicide where the victim was kidnapped in a steamer trunk. Determined the air exchange rate in the steamer trunk and how long the person could survive.

Conducted *in situ* measurement of human exposure to toluene fumes released during nailpolish application for a plaintiffs attorney pursuing a California Proposition 65 product labeling case. June, 1993.

Conducted a forensic *in situ* investigation for the Butte County, CA Sheriff's Department of the emissions of a portable heater used in the bedroom of two twin one year old girls who suffered simultaneous crib death.

Consult with OSHA on the 1995 proposed new regulation regarding indoor air quality and environmental tobacco smoke.

Consult with EPA on the proposed Building Alliance program and with OSHA on the proposed new OSHA IAQ regulation.

Johnson Controls Audit/Certification Expert Review; Milwaukee, WI. May 28-29, 1997.

Winner of the nationally published 1999 Request for Proposals by the State of Washington to conduct a comprehensive indoor air quality investigation of the Washington State Department of Ecology building in Lacey, WA.

Selected by the State of California Attorney General's Office in August, 2000 to conduct a comprehensive indoor air quality investigation of the Tulare County Court House.

Lawrence Berkeley Laboratory IAQ Experts Workshop: "Cause and Prevention of Sick Building Problems in Offices: The Experience of Indoor Environmental Quality Investigators", Berkeley, California, May 26-27, 2004.

Provide consultation and chemical emission rate testing to the State of California Attorney General's Office in 2013-2015 regarding the chemical emissions from e-cigarettes.

PEER-REVIEWED PUBLICATIONS :

F.J.Offermann, C.D.Hollowell, and G.D.Roseme, "Low-Infiltration Housing in Rochester, New York: A Study of Air Exchange Rates and Indoor Air Quality," *Environment International*, *8*, pp. 435-445, 1982.

W.W.Nazaroff, F.J.Offermann, and A.W.Robb, "Automated System for Measuring Air Exchange Rate and Radon Concentration in Houses," *Health Physics*, *45*, pp. 525-537, 1983.

F.J.Offermann, W.J.Fisk, D.T.Grimsrud, B.Pedersen, and K.L.Revzan, "Ventilation Efficiencies of Wall- or Window-Mounted Residential Air-to-Air Heat Exchangers," *ASHRAE Annual Transactions*, *89-2B*, pp 507-527, 1983.

W.J.Fisk, K.M.Archer, R.E Chant, D. Hekmat, F.J.Offermann, and B.Pedersen, "Onset of Freezing in Residential Air-to-Air Heat Exchangers," *ASHRAE Annual Transactions*, *91-1B*, 1984.

W.J.Fisk, K.M.Archer, R.E Chant, D. Hekmat, F.J.Offermann, and B.Pedersen, "Performance of Residential Air-to-Air Heat Exchangers During Operation with Freezing and Periodic Defrosts," *ASHRAE Annual Transactions*, *91-1B*, 1984.

F.J.Offermann, R.G.Sextro, W.J.Fisk, D.T.Grimsrud, W.W.Nazaroff, A.V.Nero, and K.L.Revzan, "Control of Respirable Particles with Portable Air Cleaners," *Atmospheric Environment*, Vol. 19, pp.1761-1771, 1985.

R.G.Sextro, F.J.Offermann, W.W.Nazaroff, A.V.Nero, K.L.Revzan, and J.Yater, "Evaluation of Indoor Control Devices and Their Effects on Radon Progeny Concentrations," *Atmospheric Environment*, *12*, pp. 429-438, 1986.

W.J. Fisk, R.K.Spencer, F.J.Offermann, R.K.Spencer, B.Pedersen, R.Sextro, "Indoor Air Quality Control Techniques," *Noyes Data Corporation*, Park Ridge, New Jersey, (1987).

F.J.Offermann, "Ventilation Effectiveness and ADPI Measurements of a Forced Air Heating System," *ASHRAE Transactions* , Volume 94, Part 1, pp 694-704, 1988.

F.J.Offermann and D. Int-Hout "Ventilation Effectiveness Measurements of Three Supply/Return Air Configurations," *Environment International* , Volume 15, pp 585-592 1989.

F.J. Offermann, S.A. Loiselle, M.C. Quinlan, and M.S. Rogers, "A Study of Diesel Fume Entrainment in an Office Building," *IAQ '89*, The Human Equation: Health and Comfort, pp 179-183, ASHRAE, Atlanta, GA, 1989.

R.G.Sextro and F.J.Offermann, "Reduction of Residential Indoor Particle and Radon Progeny Concentrations with Ducted Air Cleaning Systems," submitted to *Indoor Air*, 1990.

S.A.Loiselle, A.T.Hodgson, and F.J.Offermann, "Development of An Indoor Air Sampler for Polycyclic Aromatic Compounds", *Indoor Air* , Vol 2, pp 191-210, 1991.

F.J.Offermann, S.A.Loiselle, A.T.Hodgson, L.A. Gundel, and J.M. Daisey, "A Pilot Study to Measure Indoor Concentrations and Emission Rates of Polycyclic Aromatic Compounds", *Indoor Air* , Vol 4, pp 497-512, 1991.

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F.J. Offermann, J. Daisey, A. Hodgson, L. Gundell, and S. Loiselle, "Indoor Concentrations and Emission Rates of Polycyclic Aromatic Compounds", *Indoor Air,* Vol 4, pp 497-512 (1992).

F.J. Offermann, S. A. Loiselle, R.G. Sextro, "Performance of Air Cleaners Installed in a Residential Forced Air System," *ASHRAE Journal*, pp 51-57, July, 1992.

F.J. Offermann and S. A. Loiselle, "Performance of an Air-Cleaning System in an Archival Book Storage Facility," *IAQ'92*, ASHRAE, Atlanta, GA, 1992.

S.B. Hayward, K.S. Liu, L.E. Alevantis, K. Shah, S. Loiselle, F.J. Offermann, Y.L. Chang, L. Webber, “Effectiveness of Ventilation and Other Controls in Reducing Exposure to ETS in Office Buildings,” Indoor Air ’93, Helsinki, Finland, July 4-8, 1993.

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K.S. Liu, L.E. Alevantis, and F.J. Offermann, "A Survey of Environmental Tobacco Smoke Controls in California Office Buildings", *Indoor Air*, Vol 11, pp. 26-34, 2001.

F.J. Offermann, R. Colfer, P. Radzinski, and J. Robertson, "Exposure to Environmental Tobacco Smoke in an Automobile", Indoor Air 2002, Monterey, California, July 2002.

F. J. Offermann, J.P. Robertson, and T. Webster, "The Impact of Tracer Gas Mixing on Airflow Rate Measurements in Large Commercial Fan Systems", Indoor Air 2002, Monterey, California, July 2002.

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in Office Buildings: Distilling the Experience of Indoor Environmental Investigators", submitted to Indoor Air 2005, Beijing, China, September 4-9, 2005.

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F.J. Offermann and A.T. Hodgson, "Emission Rates of Volatile Organic Compounds in New Homes", Indoor Air 2011, Austin, TX, June, 2011.

P. Jenkins, R. Johnson, T. Phillips, and F. Offermann, "Chemical Concentrations in New California Homes and Garages", Indoor Air 2011, Austin, TX, June, 2011.

W. J. Mills, B. J. Grigg, F. J. Offermann, B. E. Gustin, and N. E. Spingarm, "Toluene and Methyl Ethyl Ketone Exposure from a Commercially Available Contact Adhesive", Journal of Occupational and Environmental Hygiene, 9:D95-D102 May, 2012.

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F. J. Offermann, A. T. Hodgson, P. L. Jenkins, R. D. Johnson, and T. J. Phillips, "Attached Garages as a Source of Volatile Organic Compounds in New Homes", HB 2012, Brisbane, CA, July, 2012.

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"Buildings That Make You Sick: Indoor Air Pollution", Presented to the Sacramento Association of Professional Energy Managers, Sacramento, CA, November 18, 1986.

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"Controlling Indoor Air Quality: The New ASHRAE Ventilation Standards and How to Evaluate Indoor Air Quality", Presented at a conference "Improving Energy Efficiency and Indoor Air Quality in Commercial Buildings," National Energy Management Institute, Reno, Nevada, November 4, 1988.

"A Study of Diesel Fume Entrainment Into an Office Building," Presented at Indoor Air '89: The Human Equation: Health and Comfort, American Society of Heating, Refrigeration, and Air Conditioning Engineers, San Diego, CA, April 17-20, 1989.

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NV, October 1-2, 1992; New York City, NY, October 26-27, 1992, Las Vegas, NV, March 18-19, 1993; Lake Tahoe, CA, July 14-15, 1994; Las Vegas, NV, April 3-4, 1995; Lake Tahoe, CA, July 11-12, 1996; Miami, Fl, December 9-10, 1996.

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"Duct Cleaning: Who Needs It ? How Is It Done ? What Are The Costs ?" What Are the Risks ?, Moderator of Forum at the ASHRAE Annual Meeting, Indianapolis ID, June 23, 1991.

"Operating Healthy Buildings", Association of Plant Engineers, Oakland, CA, November 14, 1991.

"Duct Cleaning Perspectives", Moderator of Seminar at the ASHRAE Semi-Annual Meeting, Indianapolis, IN, June 24, 1991.

"Duct Cleaning: The Role of the Environmental Hygienist," ASHRAE Annual Meeting, Anaheim, CA, January 29, 1992.

"Emerging IAQ Issues", Fifth National Conference on Indoor Air Pollution, University of Tulsa, Tulsa, OK, April 13-14, 1992.

"International Symposium on Room Air Convection and Ventilation Effectiveness", Member of Scientific Advisory Board, University of Tokyo, July 22-24, 1992.

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"Outside Air Economizers: IAQ Friend or Foe", Moderator of Forum at the ASHRAE Annual Meeting, Chicago, IL, January 26, 1993.

"Orientation to Indoor Air Quality," an EPA two and one half day comprehensive indoor air quality introductory workshop for public officials and building property managers; Sacramento, September 28-30, 1992; San Francisco, February 23-24, 1993; Los Angeles, March 16-18, 1993; Burbank, June 23, 1993; Hawaii, August 24-25, 1993; Las Vegas, August 30, 1993; San Diego, September 13-14, 1993; Phoenix, October 18-19, 1993; Reno, November 14-16, 1995; Fullerton, December 3-4, 1996; Fresno, May 13-14, 1997.

"Building Air Quality: A Guide for Building Owners and Facility Managers," an EPA one half day indoor air quality introductory workshop for building owners and facility managers. Presented throughout Region IX 1993-1995.

“Techniques for Airborne Disease Control”, EPRI Healthcare Initiative Symposium; San Francisco, CA; June 7, 1994.

“Diagnosing and Mitigating Indoor Air Quality Problems”, CIHC Conference; San Francisco, September 29, 1994.

”Indoor Air Quality: Tools for Schools,” an EPA one day air quality management workshop for school officials, teachers, and maintenance personnel; San Francisco, October 18-20, 1994; Cerritos, December 5, 1996; Fresno, February 26, 1997; San Jose, March 27, 1997; Riverside, March 5, 1997; San Diego, March 6, 1997; Fullerton, November 13, 1997; Santa Rosa, February 1998; Cerritos, February 26, 1998; Santa Rosa, March 2, 1998.

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“Diagnostic Protocols for Building IAQ Assessment”, American Society of Safety Engineers Seminar: ‘Indoor Air Quality – The Next Door’; San Jose Chapter, September 27, 1995; Oakland Chapter, 9, 1997.

“Diagnostic Protocols for Building IAQ Assessment”, Local 39; Oakland, CA, October 3, 1995.

“Diagnostic Protocols for Solving IAQ Problems”, CSU-PPD Conference; October 24, 1995.

“Demonstrating Compliance with ASHRAE 62-1989 Ventilation Requirements”, AIHA; October 25, 1995.

“IAQ Diagnostics: Hands on Assessment of Building Ventilation and Pollutant Transport”, EPA Region IX; Phoenix, AZ, March 12, 1996; San Francisco, CA, April 9, 1996; Burbank, CA, April 12, 1996.

“Experimental Validation of ASHRAE 129P: Standard Method of Measuring Air Change Effectiveness”, Room Vent ‘96 / International Symposium on Room Air Convection and Ventilation Effectiveness"; Yokohama, Japan, July 16-19, 1996.

“IAQ Diagnostic Methodologies and RFP Development”, CCEHSA 1996 Annual Conference, Humboldt State University, Arcata, CA, August 2, 1996.

“The Practical Side of Indoor Air Quality Assessments”, California Industrial Hygiene Conference ‘96, San Diego, CA, September 2, 1996.

"ASHRAE Standard 62: Improving Indoor Environments", Pacific Gas and Electric Energy Center, San Francisco, CA, October 29, 1996.

"Operating and Maintaining Healthy Buildings", April 3-4, 1996, San Jose, CA; July 30, 1997, Monterey, CA.

"IAQ Primer", Local 39, April 16, 1997; Amdahl Corporation, June 9, 1997; State Compensation Insurance Fund's Safety & Health Services Department, November 21, 1996.

"Tracer Gas Techniques for Measuring Building Air Flow Rates", ASHRAE, Philadelphia, PA, January 26, 1997.

"How to Diagnose and Mitigate Indoor Air Quality Problems"; Women in Waste; March 19, 1997.

"Environmental Engineer: What Is It?", Monte Vista High School Career Day; April 10, 1997.

"Indoor Environment Controls: What's Hot and What's Not", Shaklee Corporation; San Francisco, CA, July 15, 1997.

"Measurement of Ventilation System Performance Parameters in the US EPA BASE Study", Healthy Buildings/IAQ'97, Washington, DC, September 29, 1997.

"Operations and Maintenance for Healthy and Comfortable Indoor Environments", PASMA; October 7, 1997.

"Designing for Healthy and Comfortable Indoor Environments", Construction Specification Institute, Santa Rosa, CA, November 6, 1997.

"Ventilation System Design for Good IAQ", University of Tulsa 10th Annual Conference, San Francisco, CA, February 25, 1998.

"The Building Shell", Tools For Building Green Conference and Trade Show, Alameda County Waste Management Authority and Recycling Board, Oakland, CA, February 28, 1998.

"Identifying Fungal Contamination Problems In Buildings", The City of Oakland Municipal Employees, Oakland, CA, March 26, 1998.

"Managing Indoor Air Quality in Schools: Staying Out of Trouble", CASBO, Sacramento, CA, April 20, 1998.

"Indoor Air Quality", CSOOC Spring Conference, Visalia, CA, April 30, 1998.

"Particulate and Gas Phase Air Filtration", ACGIH/OSHA, Ft. Mitchell, KY, June 1998.

"Building Air Quality Facts and Myths", The City of Oakland / Alameda County Safety Seminar, Oakland, CA, June 12, 1998.

"Building Engineering and Moisture", Building Contamination Workshop, University of California Berkeley, Continuing Education in Engineering and Environmental Management, San Francisco, CA, October 21-22, 1999.

"Identifying and Mitigating Mold Contamination in Buildings", Western Construction Consultants Association, Oakland, CA, March 15, 2000; AIG Construction Defect Seminar, Walnut Creek, CA, May 2, 2001; City of Oakland Public Works Agency, Oakland, CA, July 24, 2001; Executive Council of Homeowners, Alamo, CA, August 3, 2001.

"Using the EPA BASE Study for IAQ Investigation / Communication", Joint Professional Symposium 2000, American Industrial Hygiene Association, Orange County & Southern California Sections, Long Beach, October 19, 2000.

"Ventilation," Indoor Air Quality: Risk Reduction in the 21st Century Symposium, sponsored by the California Environmental Protection Agency/Air Resources Board, Sacramento, CA, May 3-4, 2000.

"Workshop 18: Criteria for Cleaning of Air Handling Systems", Healthy Buildings 2000, Espoo, Finland, August 2000.

"Closing Session Summary: 'Building Investigations' and 'Building Design & Construction', Healthy Buildings 2000, Espoo, Finland, August 2000.

"Managing Building Air Quality and Energy Efficiency, Meeting the Standard of Care", BOMA, MidAtlantic Environmental Hygiene Resource Center, Seattle, WA, May 23rd, 2000; San Antonio, TX, September 26-27, 2000.

"Diagnostics & Mitigation in Sick Buildings: When Good Buildings Go Bad," University of California Berkeley, September 18, 2001.

"Mold Contamination: Recognition and What To Do and Not Do", Redwood Empire Remodelers Association; Santa Rosa, CA, April 16, 2002.

"Investigative Tools of the IAQ Trade", Healthy Indoor Environments 2002; Austin, TX; April 22, 2002.

"Finding Hidden Mold: Case Studies in IAQ Investigations", AIHA Northern California Professionals Symposium; Oakland, CA, May 8, 2002.

"Assessing and Mitigating Fungal Contamination in Buildings", Cal/OSHA Training; Oakland, CA, February 14, 2003 and West Covina, CA, February 20-21, 2003.

"Use of External Containments During Fungal Mitigation", Invited Speaker, ACGIH Mold Remediation Symposium, Orlando, FL, November 3-5, 2003.

Building Operator Certification (BOC), 106-IAQ Training Workshops, Northwest Energy Efficiency Council; Stockton, CA, December 3, 2003; San Francisco, CA, December 9, 2003; Irvine, CA, January 13, 2004; San Diego, January 14, 2004; Irwindale, CA, January 27, 2004; Downey, CA, January 28, 2004; Santa Monica, CA, March 16, 2004; Ontario, CA, March 17, 2004; Ontario, CA, November 9, 2004, San Diego, CA, November 10, 2004; San Francisco, CA, November 17, 2004; San Jose, CA, November 18, 2004; Sacramento, CA, March 15, 2005.

"Mold Remediation: The National QUEST for Uniformity Symposium", Invited Speaker, Orlando, Florida, November 3-5, 2003.

"Mold and Moisture Control", Indoor Air Quality workshop for The Collaborative for High Performance Schools (CHPS), San Francisco, December 11, 2003.

"Advanced Perspectives In Mold Prevention & Control Symposium", Invited Speaker, Las Vegas, Nevada, November 7-9, 2004.

"Building Sciences: Understanding and Controlling Moisture in Buildings", American Industrial Hygiene Association, San Francisco, CA, February 14-16, 2005.

"Indoor Air Quality Diagnostics and Healthy Building Design", University of California Berkeley, Berkeley, CA, March 2, 2005.

"Improving IAQ = Reduced Tenant Complaints", Northern California Facilities Exposition, Santa Clara, CA, September 27, 2007.

"Defining Safe Building Air", Criteria for Safe Air and Water in Buildings, ASHRAE Winter Meeting, Chicago, IL, January 27, 2008.

"Update on USGBC LEED and Air Filtration", Invited Speaker, NAFA 2008 Convention, San Francisco, CA, September 19, 2008.

"Ventilation and Indoor air Quality in New California Homes", National Center of Healthy Housing, October 20, 2008.

"Indoor Air Quality in New Homes", California Energy and Air Quality Conference, October 29, 2008.

"Mechanical Outdoor air Ventilation Systems and IAQ in New Homes", ACI Home Performance Conference, Kansas City, MO, April 29, 2009.

"Ventilation and IAQ in New Homes with and without Mechanical Outdoor Air Systems", Healthy Buildings 2009, Syracuse, CA, September 14, 2009.

"Ten Ways to Improve Your Air Quality", Northern California Facilities Exposition, Santa Clara, CA, September 30, 2009.

"New Developments in Ventilation and Indoor Air Quality in Residential Buildings", Westcon meeting, Alameda, CA, March 17, 2010.

"Intermittent Residential Mechanical Outdoor Air Ventilation Systems and IAQ", ASHRAE SSPC 62.2 Meeting, Austin, TX, April 19, 2010.

"Measured IAQ in Homes", ACI Home Performance Conference, Austin, TX, April 21, 2010.

"Respiration: IEQ and Ventilation", AIHce 2010, How IH Can LEED in Green buildings, Denver, CO, May 23, 2010.

"IAQ Considerations for Net Zero Energy Buildings (NZEB)", Northern California Facilities Exposition, Santa Clara, CA, September 22, 2010.

"Energy Conservation and Health in Buildings", Berkeley High SchoolGreen Career Week, Berkeley, CA, April 12, 2011.

"What Pollutants are Really There ?", ACI Home Performance Conference, San Francisco, CA, March 30, 2011.

"Energy Conservation and Health in Residences Workshop", Indoor Air 2011, Austin, TX, June 6, 2011.

"Assessing IAQ and Improving Health in Residences", US EPA Weatherization Plus Health, September 7, 2011.

"Ventilation: What a Long Strange Trip It's Been", Westcon, May 21, 2014.

"Chemical Emissions from E-Cigarettes: Direct and Indirect Passive Exposures", Indoor Air 2014, Hong Kong, July, 2014.

"Infectious Disease Aerosol Exposures With and Without Surge Control Ventilation System Modifications", Indoor Air 2014, Hong Kong, July, 2014.

"Chemical Emissions from E-Cigarettes", IMF Health and Welfare Fair, Washington, DC, February 18, 2015.

"Chemical Emissions and Health Hazards Associated with E-Cigarettes", Roswell Park Cancer Institute, Buffalo, NY, August 15, 2014.

"Formaldehyde Indoor Concentrations, Material Emission Rates, and the CARB ATCM", Harris Martin's Lumber Liquidators Flooring Litigation Conference, WQ Minneapolis Hotel, May 27, 2015.

"Chemical Emissions from E-Cigarettes: Direct and Indirect Passive Exposure", FDA Public Workshop: Electronic Cigarettes and the Public Health, Hyattsville, MD June 2, 2015.

"Creating Healthy Homes, Schools, and Workplaces", Chautauqua Institution, Athenaeum Hotel, August 24, 2015.

"Diagnosing IAQ Problems and Designing Healthy Buildings", University of California Berkeley, Berkeley, CA, October 6, 2015.

"Diagnosing Ventilation and IAQ Problems in Commercial Buildings", BEST Center Annual Institute, Lawrence Berkeley National Laboratory, January 6, 2016.

"A Review of Studies of Ventilation and Indoor Air Quality in New Homes and Impacts of Environmental Factors on Formaldehyde Emission Rates From Composite Wood Products", AIHce2016, May, 21-26, 2016.

"Admissibility of Scientific Testimony", Science in the Court, Proposition 65 Clearinghouse Annual Conference, Oakland, CA, September 15, 2016.

"Indoor Air Quality and Ventilation", ASHRAE Redwood Empire, Napa, CA, December 1, 2016.

EXHIBIT B

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
www.sfplanning.org

DISCRETIONARY REVIEW PUBLIC (DRP)

APPLICATION PACKET

Pursuant to Planning Code Section 311, the Planning Commission may exercise its power of Discretionary Review over a building permit application.

For questions, you can call the Planning counter at 628.652.7300 or email pic@sfgov.org where planners are able to assist you.

Please read the Discretionary Review Informational Packet carefully before the application form is completed.

WHAT TO SUBMIT:

- ☐ Two (2) complete applications signed.
- ☐ A Letter of Authorization from the DR requestor giving you permission to communicate with the Planning Department on their behalf, if applicable.
- ☐ Photographs or plans that illustrate your concerns.
- ☐ Related covenants or deed restrictions (if any).
- ☐ A digital copy (CD or USB drive) of the above materials (optional).
- ☐ Payment via check, money order or debit/credit for the total fee amount for this application. (See Fee Schedule).

HOW TO SUBMIT:

To file your Discretionary Review Public application, please email the completed application to cpc.intake@sfgov.org.

Español: Si desea ayuda sobre cómo llenar esta solicitud en español, por favor llame al 628.652.7550. Tenga en cuenta que el Departamento de Planificación requerirá al menos un día hábil para responder.

中文：如果您希望獲得使用中文填寫這份申請表的幫助，請致電628.652.7550。請注意，規劃部門需要至少一個工作日來回應。

Filipino: Kung gusto mo ng tulong sa pagkumpleto ng application na ito sa Filipino, paki tawagan ang 628.652.7550. Paki tandaan na mangangailangan ang Planning Department ng hindi kukulangin sa isang araw na pantrabaho para makasagot.

2021.0323.7148

San Francisco Planning

DISCRETIONARY REVIEW PUBLIC (DRP)

APPLICATION

Discretionary Review Requestor's Information

Name: Libkra Investment Corp.

Address: 1475 Fairfax Avenue, San Francisco, CA 94214

Email Address: akseth@aol.com

Telephone: (415) 298-9880

Please Select Billing Contact: ☐ Applicant ☑ Other (see below for details)

Name: Michael Lozeau Email: michael@lozeaudrury.com Phone: (510) 836-4200 x.101

Information on the Owner of the Property Being Developed

Name: 1030 Polk Associates LP

Company/Organization:

Address: 2000 Oakdale Avenue, Unit A-1, San Francisco, CA

Email Address:

Telephone:

Property Information and Related Applications

Project Address: 2000 Oakdale Avenue

Block/Lot(s): 5315/051

Building Permit Application No(s): 2021.0323.7148

ACTIONS PRIOR TO A DISCRETIONARY REVIEW REQUEST

PRIOR ACTION	YES	NO
Have you discussed this project with the permit applicant?	✓	
Did you discuss the project with the Planning Department permit review planner?	✓	
Did you participate in outside mediation on this case? (including Community Boards)		✓

Changes Made to the Project as a Result of Mediation.
If you have discussed the project with the applicant, planning staff or gone through mediation, please summarize the result, including any changes that were made to the proposed project.

Mr. Lozeau spoke with the applicant regarding Requestor's concerns. That effort did not result in any changes to the project.

DISCRETIONARY REVIEW REQUEST

In the space below and on seperate paper, if necessary, please present facts sufficient to answer each question.

1. What are the reasons for requesting Discretionary Review? The project meets the standards of the Planning Code and the Residential Design Guidelines. What are the exceptional and extraordinary circumstances that justify Discretionary Review of the project? How does the project conflict with the City's General Plan or the Planning Code's Priority Policies or Residential Design Guidelines? Please be specific and site specific sections of the Residential Design Guidelines.

See Attachment 1. The reasons for discretionary review include 1) the project's cannabis retail use cannot be permitted because it exceeds "1/3 of the total floor area occupied by the PDR and Cannabis Retail Uses on the premises" 2) alternatively, the project exceeds the cumulative use size limit of 2,500 sf, 3) the premium rent paid by cannabis operations is inconsistent with the PDR district goals, and 4) cumulative odor concerns.

2. The Residential Design Guidelines assume some impacts to be reasonable and expected as part of construction. Please explain how this project would cause unreasonable impacts. If you believe your property, the property of others or the neighborhood would be unreasonably affected, please state who would be affected, and how.

The approval of a cannabis retail business in the PDR district is contrary to the goal of maintaining lower rents in the PDR district to benefit traditional PDR uses. See Attachment 1.

3. What alternatives or changes to the proposed project, beyond the changes (if any) already made would respond to the exceptional and extraordinary circumstances and reduce the adverse effects noted above in question #1?

In order to address allowing a type of business that pays premium rents in a PDR district, an alternative identifying a space in a retail area outside of the PDR district would be appropriate.

DISCRETIONARY REVIEW REQUESTOR'S AFFIDAVIT

Under penalty of perjury the following declarations are made:

a) The undersigned is the DR requestor or their authorized representation.

Signature	Name (Printed)
	Michael R. Lozeau, Lozeau Drury, LLP

Relationship to Requestor (i.e. Attorney, Architect, etc.)	Phone	Email
Attorney	510-836-4200 x. 101	michael@lozeaudrury.com

For Department Use Only

Application received by Planning Department:

By: _____ Date: _____

Libkra Investment Corp. Request for Discretionary Review of
2000 Oakdale Avenue, Building Permit Application No. 2021.0323.7148

Submitted by authorized agent:
Michael R. Lozeau
Richard T. Drury
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612

Attachment 1

Several exceptional circumstances warrant the Planning Commission to conduct a discretionary review of the proposed cannabis retail operation at 2000 Oakdale Avenue.

A. The Project's Proposed Cannabis Retail Use is Inconsistent With the Sizing Restrictions Established in the Zoning Code.

The total square footage of the 2000 Oakdale project would be 3,130 square feet. If the total square footage of the proposed project were attributed to the cannabis retail use, the Project would plainly exceed the 2,500 square foot limit on cannabis retail in the Production, Distribution, and Repair ("PDR") district. (SF Zoning Code § 210.3A, Table 210.3A, n. 1.) Likewise, if the entire space is in furtherance of the retail sale of cannabis, the proposed project also would be inconsistent with the limit that a cannabis retail use be limited to "1/3 of the total floor area occupied by the PDR and Cannabis Retail Uses on the premises." (SF Zoning Code §210.3, Table 210.3, n. 21.)

However, the 2000 Oakdale Avenue project attributes 1,123 square feet of the proposed space to bathrooms and hallways which it deems commercial uses and another 1,379 square feet to office, storage, and processing all of which it deems office uses. The primary cannabis retail use, which all of the space is proposed to support, is allocated 628 square feet. It is not clear from the application how the allocation of uses is applied to the 2,500 square foot restriction on cannabis retail or the one-third of Cannabis Retail plus PDR uses restriction. A careful review of the relevant code sections, however, demonstrates that the Project is either inconsistent with the one-third restriction for cannabis retail or, alternatively, the overall square foot limit on cannabis retail. Given the oddity of a retail operation that purports to attribute 80 percent of its overall floor area to non-retail activities, and the resulting strange outcomes of applying retail zoning requirements that evolved over time from more traditional retail that devoted the vast percentage of its overall floor area to the retail sales activities, the Planning Commission should address the unforeseen application of these requirements to the cannabis context. This exceptional circumstance should be addressed by the Planning Commission.

1. **The proposed Project violates the restriction that cannabis retail be limited to 1/3 of the total floor area occupied by the PDR and Cannabis Retail Uses on the premises.**

As proposed, the Project violates the Section 210.3, Table 210.3, n. 21 restriction that the cannabis retail use not exceed one-third of the total floor are occupied "by the PDR and Cannabis Retail Uses on the premises." (SF Zoning Code §210.3, Table 210.3, n. 21.) Because the occupied floor area does not include the various storage, processing, management and other activities proposed for a majority of the project space, and there are no other PDR uses, a plain reading of the zoning code sections requires the proposed cannabis retail square footage not to exceed 209 square feet. It appears that the City has not considered the results of the various exclusions that apply to tallying a project's occupied floor area in the context of a retail operation which requires disproportionately more space for storage, management, processing, and other activities than the retail sales.

Occupied floor area is defined in the zoning code as "[f]loor area devoted to, or capable of being devoted to, a principal or Conditional Use and its accessory uses." (SF Zoning Code § 102 ["Floor Area, Occupied"].) However, "[f]or purposes of computation, "Occupied Floor Area" shall consist of the Gross Floor Area, as defined in this Code, minus the following: (d) Restrooms … (e) Space in a retail store for store management, show windows, and dressing rooms, and for incidental repairs, processing, packaging, and stockroom storage of merchandise for sale on the premises." (*Id*.). In addition, bike storage is excluded from the calculation of the gross floor area. (SF Zoning Code § 102 ["Floor Area, Gross", subparagraph (b)(8)].) Applying these criteria to the proposed project, the occupied floor area is limited to 628 square feet – the area attributed to the cannabis retail use. All of the other uses, including storage, management activities and bike storage, are not occupied floor area pursuant to the Code.

How this then fits into the PDR zoning requirements leads to an exceptional situation, presumably not anticipated by the City, that requires proposed cannabis retail to always be one-third of whatever square footage is cannabis use is proposed by a project.

Section 210.3, Table 210.3, n. 21 provides that "Cannabis Retail is only permitted where … (b) the Cannabis Retail Use occupies no more than 1/3 of the total floor area occupied by the ***PDR and Cannabis Retail Uses*** on the premises." (Section 210.3, Table 210.3, n. 21 [emphasis added].) There are no other PDR uses proposed within the project. All of the proposed uses appear to be accessory uses to the cannabis retail use. None of those uses are listed in the PDR uses authorized in the PDR district. (*Id*., Table 210.3.) As a result, the total square footage of occupied floor area, as defined by Section 102, that are ***PDR and Cannabis Retail*** uses at the site is 628 square feet. Based on Section 210.3's plain language, this project will be limited to one third of its proposed 628 square feet of cannabis retail use, i.e. 209.3 square feet. The conundrum created by the code of an ever decreasing area of cannabis retail at a project that only includes accessory uses to the cannabis retail and no PDR use listed in the code is to propose to include PDR uses in furtherance of the PDR district. Only because the proposed Project pays no mind to the uses, goals and priorities of the PDR district zoning, does it trigger a

result that severely limits the proposed cannabis retail use. The Planning Commission should address this exceptional circumstance in order to address the potential inconsistencies and shortcomings the zoning code encounters in processing a cannabis retail establishment in the PDR district.

2. Alternatively, the square footage for various uses necessary to the operation of a cannabis retail use should all be attributed to the retail use.

Alternatively, the zoning code limits certain uses in the PDR District to a "cumulative use size limit." (SF Zoning Code § 210.3A, Table 210.3A, n. 1.) Section 210.3A provides that:

> The use area shall be measured as the Occupied Floor Area of all retail or offices activities on a lot that have a (1) or (2) in the respective zoning district's use control column in Table 210.3 (Zoning Control Table for PDR Districts). Additionally, a cumulative use size maximum applies in PDR-1-B and PDR-2 Districts, such that the combined floor area of any and all uses permitted by Table 210.3 with a (1) or (2) in the respective zoning district's use control column may not exceed the limits stated in the table below for any given lot.

(*Id*.) If the inclusion in "Occupied Floor Area" of "all retail or offices activities" is meant to override the exclusion of various office activities from the occupied floor area calculation found in Section 102, then all of the square footage of all of the uses in the Project (with the exception of the bike parking room). The bike room appears to include about 60 square feet of space. Subtracting the 60 square feet of bike storage from the overall square footage of the space results in a cumulative use size of 3070 square feet. As a result, and in the alternative, the proposed cannabis retail store exceeds to 2,500 square feet cumulative use size limit.

3. There is Evidence That City's Odor Control Requirements Do Not Prevent Order From Nearby Cannabis Operations.

Slightly over 600 feet away from 2000 Oakdale Avenue is an existing cannabis operation located at 75 Industrial Street. Requestor's president, Knut Akseth, drives past this address on a daily basis. (Dec'l of Knut Akseth, attached.) As requestor passes this operation, he finds he must roll up his windows in order to minimize the overwhelming cannabis odor at this location. (*Id*.) The cannabis uses at 75 Industrial Street include, but may not be limited to, cultivation, packaging, and wholesale sales. Some of these uses overlap with the uses proposed at 2000 Oakdale Avenue. There is no information available regarding the business's odor control plan or the type of odor control equipment that would be installed. (*See* Police Code, Art. 16, §1618(v).) Despite the applicability of this code provision to the existing cannabis business at 75 Industrial Street, cannabis odors from the facility are readily perceived by people driving or otherwise passing by the facility. Requestor is concerned that, in addition to their attempts to avoid the cannabis odors while driving down Industrial Street, that nuisance odor will persist for the new cannabis business as they arrive at their property on Oakdale Avenue. (Akseth Dec'l.) Requestor also is concerned that the potential establishment of a stretch of malodorous

cannabis for several blocks leading to its 1980 Oakdale Avenue property will have negative impacts on its tenants and their workers. (*Id*.) It also may negatively impact the desirability and marketability of the 1980 Oakdale Avenue property. (*Id*.) This cumulative odor concern in the vicinity of the Project is an exceptional circumstance that should be addressed by the Commission.

B. Removing a Total of 3,130 Square Feet of PDR Space for Uses Dedicated to Cannabis Retail is Inconsistent With the Policies and Goals of the PDR District, Including Preserving Flexible Building Spaces and Lower Rents.

The Planning Commission should grant discretionary review to determine whether allowing cannabis retail in the PDR district is consistent with its primary goal of suppressing rents for traditional PDR uses in this area. A key goal the City is seeking to realize by the creation of the PDR district is to maintain an area that will maintain generally lower rents as compared to other areas of the City where office, retail, and residential uses are allowed. The PDR zoning achieves this goal by generally prohibiting retail and residential uses in the PDR zone. Section 210.3 of the Zoning Code emphasizes that, "[i]mportantly, PDR uses are limited in the amount of rent they can afford relative to office, retail, and residential uses, yet are important sectors of the City's economy." (SF Zoning Code § 210.3.) "PDR represents a range of business types and industries that despite their obvious diversity, share the need for relatively flexible building space, cheap rents, and in most cases, a separation from housing." SF Planning Dept., "Industrial Land in San Francisco: Understanding Production, Distribution and Repair," p. 18 (July 2002) [http://sf-planning.org/sites/default/files/FileCenter/Documents/4893-CW_DPR_chapter5_2.pdf].) Available information suggests that, rather than maintain rents typical of the PDR district, cannabis retailers pay a premium to landlords: "Property owners that will consider a cannabis usage are able to charge a premium, both because of the limited availability of cannabis-friendly space as well as for taking on the risk of collecting income from a federally illegal business operation. " (https://www.globest.com/2021/08/10/no-stopping-the-influx-of-capital-into-cannabis-real-estate/.) "[T]he booming sales of recreational cannabis ever since it was legalized in January 2020 proved its vendors are valuable tenants, ones that paid premium rents even as the coronavirus pandemic gutted other retailers." (https://www.bisnow.com/chicago/news/retail/a-mad-rush-for-new-cannabis-retail-space-begins-again-as-state-completes-new-round-of-licensing-110005.)

It is not clear that the City's PDR zoning was enacted with any consideration of the potential premium rents that would be paid by cannabis retailers. The City's zoning code amendments were adopted in 2017 at the time the legal cannabis industry was just beginning to take shape. Although the regulations contemplate cannabis retail businesses that do not exceed 2,500 square feet in size, that size limit does not address the impacts of this use on the rent-suppression goals of the PDR district. Given the questions regarding the Project's compliance with the regulation's size limits, and the new information that these types of uses encourage premium rental rates in contravention of the PDR District's goals, the Planning Commission should acknowledge that extraordinary circumstance and grant discretionary review of the Project.

Declaration of Knut Akseth in Support of request for Discretionary Review

I, Knut Akset, declare as follows:

1. I am the President of Libkra Investment Corp. Libkra Investment Corp. owns property at 1980 Oakdale Avenue, immediately to the southeast of 2000 Oakdale Avenue. My office address is 1475 Fairfax Avenue, San Francisco. My residence is in the Glen Park/Noe Valley area of San Francisco.

2. My daily commute route includes driving on Industrial Avenue to and from Oakdale Avenue. I drive this section of road at least twice a day, once in each direction. My property management activities in the area sometimes require me to drive this stretch of Industrial Avenue more than twice per day.

3. There is a cannabis business located at 75 Industrial Avenue at the corner of Palou Avenue, one block east of Oakdale Avenue. There is no sign on the building indicating that it is a cannabis business. The reason I have become aware that the building houses a cannabis business is the very strong odor of cannabis that occurs daily on Industrial Avenue adjacent to this property.

4. During my commutes past 75 Industrial Avenue, the smell is very strong if I forget to seal the car. At times, I even smell the cannabis odor with the windows closed when traffic is heavy and traffic is stop and go at the intersection of Palou Avenue and Industrial Avenue, right outside of 75 Industrial Avenue.

5. Because I smell the strong odor at this location every day, as I approach within a block of 75 Industrial Avenue, I try to remember to close my windows and turn off the HVAC or otherwise my car interior will fill with the strong obnoxious odor, which makes me feel ill. I recognize the odor as the odor of cannabis. The odor is very annoying and whenever I inadvertently leave a window open or forget to turn off the HVAC, when well past the site, I have to turn on the HVAC full blast and open the windows for several minutes to evacuate the odor from the car.

6. I have even noticed the smell while driving past on the nearby 280 freeway. Generally, I notice the odor almost daily within a block to a block and a half of 75 Industrial Avenue. I have noticed the cannabis odor at the intersection of Oakdale Avenue and Rankin Street, which is between the proposed project location and Libkra Investment Corp.'s property at 1980 Oakdale Avenue. I have gone up to the roof of 1980 Oakdale and can smell the cannabis odor from time to time there, though it varies depending on how much wind there is.

7. I have had friends and acquaintances comment on the cannabis smell in the vicinity of 75 Industrial Avenue from time to time.

8. I assume that the cannabis operation already in business at 75 Industrial Avenue is properly licensed by the City and State. Despite those permits, there is little indication that any odor control measures are effective at eliminating the cannabis odors emanating from that business. I am very concerned that the new project will be subject to the same conditions and they will prove equally ineffective. I believe that a continuous corridor of cannabis odor extending from Industrial Avenue and Palou Avenue to Oakdale Avenue and Rankin Street will be highly detrimental to my quality of life but also that of the tenants in Libkra Investment Corp.'s property at 1980 Oakdale Avenue. I believe that the potential of a strong cannabis odor around Libkra's building, and the continuous odor that tenants and others will smell from 75 Industrial Avenue to 1980 Oakdale Avenue will have a detrimental impact on the marketing of the 1980 Oakdale Avenue property.

9. 75 Industrial Avenue is located just over 600 feet from 2000 Oakdale Avenue. I believe the proposed concentration of cannabis odor sources is an unusual and exceptional circumstance that warrants discretionary review by the Planning Commission.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed September 24, 2021 at San Francisco, California.

Knut Akseth

Knut Akseth, President
Libkra Investment Corp.
1475 Fairfax Avenue
San Francisco, CA 94124

San Francisco Planning Commission
City and County of San Francisco
c/o Planning Information Center
1660 Mission Street, First Floor
San Francisco, CA 94103
CPC.Intake@sfgov.org

Re: 2000 Oakdale Avenue, San Francisco, California
Request for Discretionary Review for Permit Application No. 2021.0323.7148
Grant of Agency to Lozeau Drury LLP

Dear San Francisco Planning Commission,

I, Knut Akseth, in my capacity as President of Libkra Investment Corp., the owner of property located at 1980 Oakdale Avenue, San Francisco, hereby grant written authorization for Richard Drury and Michael R. Lozeau of Lozeau Drury LLP to file on my behalf a request for discretionary review and request for review under the California Environmental Quality Act ("CEQA") related to the above property, permit application number, and/or building permit.

Dated: Sept. 27, 2021

Sincerely,

Knut Akseth, President
Libkra Investment Corp.

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

CEQA Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)
2000 Oakdale Avenue		5315051
Case No.		**Permit No.**
2021-004141PRJ		202103237148
■ **Addition/ Alteration**	☐ **Demolition (requires HRE for Category B Building)**	☐ **New Construction**

Project description for Planning Department approval.

Install cannabis store/office space in existing first floor office space. Existing office is 3130 sq ft in size. New retail store space areas are: retail=628 sq ft., commercial (bathroom, hallways) = 1123 sq. ft., office= (office, storage, processing) = 1379 sq. ft. All work to be interior tenant improvement with no structural work. Proposed change of use from office to retail/commercial/office space.

STEP 1: EXEMPTION TYPE

The project has been determined to be exempt under the California Environmental Quality Act (CEQA).

☐	**Class 1 - Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft.
☐	**Class 3 - New Construction.** Up to three new single-family residences or six dwelling units in one building; commercial/office structures; utility extensions; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☐	**Class 32 - In-Fill Development.** New Construction of seven or more units or additions greater than 10,000 sq. ft. and meets the conditions described below: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services.
☐	**Other** ____
■	**Common Sense Exemption (CEQA Guidelines section 15061(b)(3)).** It can be seen with certainty that there is no possibility of a significant effect on the environment.

STEP 2: ENVIRONMENTAL SCREENING ASSESSMENT

TO BE COMPLETED BY PROJECT PLANNER

☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g. use of diesel construction equipment, backup diesel generators, heavy industry, diesel trucks, etc.)? (*refer to the Environmental*
☐	**Hazardous Materials:** ☐ **Maher or** ☐ **Cortese** Is the project site located within the Maher area or on a site containing potential subsurface soil or groundwater contamination and would it involve ground disturbance of at least 50 cubic yards or a change of use from an industrial use to a residential or institutional use? Is the project site located on a Cortese site or would the project involve work on a site with an existing or former gas station, parking lot, auto repair, dry cleaners, or heavy manufacturing use, or a site with current or former underground storage tanks? *if Maher box is checked, note below whether the applicant has enrolled in or received a waiver from the San Francisco Department of Public Health (DPH) Maher program, or if Environmental Planning staff has determined that hazardous material effects would be less than significant.* **Note that a categorical exemption shall not be issued for a project located on the Cortese List**
☐	**Transportation:** Does the project involve a child care facility or school with 30 or more students, or a location 1,500 sq. ft. or greater? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities? Would the project involve the intensification of or a substantial increase in vehicle trips at the project site or elsewhere in the region due to autonomous vehicle or for-hire vehicle fleet maintenance, operations or
☐	**Archeological Resources:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? If yes, archeology review is required.
☐	**Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? (*refer to the Environmental Information tab on https://sfplanninggis.org/PIM/*) **If box is checked, Environmental Planning must issue the exemption.**
☐	**Average Slope of Parcel = or > 25%, or site is in Edgehill Slope Protection Area or Northwest Mt. Sutro Slope Protection Area:** Does the project involve any of the following: (1) New building construction, except one-story storage or utility occupancy, (2) horizontal additions, if the footprint area increases more than 50%, or (3) horizontal and vertical additions increase more than 500 square feet of new projected roof area? (*refer to the Environmental Information tab on https://sfplanninggis.org/PIM/*) **If box is checked, a geotechnical report is likely required and Environmental Planning must issue the exemption.**
☐	**Seismic Hazard:** ☐ **Landslide or** ☐ **Liquefaction Hazard Zone:** Does the project involve any of the following: (1) New building construction, except one-story storage or utility occupancy, (2) horizontal additions, if the footprint area increases more than 50%, (3) horizontal and vertical additions increase more than 500 square feet of new projected roof area, or (4) grading performed at a site in the landslide hazard zone? *(refer to the Environmental Information tab on https://sfplanninggis.org/PIM/)* **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.**
Comments and Planner Signature (*optional*):	Michael Christensen

STEP 3: PROPERTY STATUS - HISTORIC RESOURCE

TO BE COMPLETED BY PROJECT PLANNER

PROPERTY IS ONE OF THE FOLLOWING: *(refer to Property Information Map)*	
☐	**Category A:** Known Historical Resource. **GO TO STEP 5.**
■	**Category B:** Potential Historical Resource (over 45 years of age). **GO TO STEP 4.**
☐	**Category C:** Not a Historical Resource or Not Age Eligible (under 45 years of age). **GO TO STEP 6.**

STEP 4: PROPOSED WORK CHECKLIST

TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
■	1. **Change of use and new construction.** Tenant improvements not included.
☐	2. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	3. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	4. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	5. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	6. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	7. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.
☐	8. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☐	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5**.
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
■	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: ADVANCED HISTORICAL REVIEW

TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. **Reclassification of property status**. *(Attach HRER Part I)* ☐ Reclassify to Category A a. Per HRER b. Other *(specify)*: ☐ Reclassify to Category C *(No further historic review)*
☐	2. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	3. **Interior alterations to publicly accessible spaces that do not** remove, alter, or obscure **character defining features**.
☐	4. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	5. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.

☐	6. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	7. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
☐	8. **Work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (*Analysis required*):
☐	9. **Work compatible** with a historic district (Analysis required):
☐	10. **Work that would not materially impair** a historic resource (Attach HRER Part II).
Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST sign below.	
☐	**Project can proceed with exemption review**. The project has been reviewed by the Preservation Planner and can proceed with exemption review. **GO TO STEP 6.**
Comments (*optional*):	
Preservation Planner Signature:	Michael Christensen

STEP 6: EXEMPTION DETERMINATION

TO BE COMPLETED BY PROJECT PLANNER

■	**Common Sense Exemption: Department staff reviewed the project and determined that there is no possibility of a significant effect on the environment. No further environmental review is required. The project is exempt under CEQA.**	
	Project Approval Action: Building Permit	**Signature:** Michael Christensen 09/08/2021
	If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the	
	Supporting documents are available for review on the San Francisco Property Information Map, which can be accessed at https://sfplanninggis.org/PIM/. Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number (ENV) and then clicking on the "Related Documents" link. Once signed or stamped and dated, this document constitutes an exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination to the Board of Supervisors can only be filed within 30 days of the project receiving the approval action.	

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional

MODIFIED PROJECT DESCRIPTION

Modified Project Description:

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
☐	Result in expansion of the building envelope, as defined in the Planning Code;
☐	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
☐	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
☐	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required	

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐	The proposed modification would not result in any of the above changes.

If this box is checked, the proposed modifications are exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice. In accordance with Chapter 31, Sec 31.08j of the San Francisco Administrative Code, an appeal of this determination can

Planner Name:	**Date:**

15027

LOZEAU DRURY, LLP
1939 HARRISON ST STE 150
OAKLAND, CA 94612
(510) 836-4200

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1/4/2022

PAY TO THE ORDER OF San Francisco Planning Department

$ **681.00

Six Hundred Eighty-One and 00/100********** DOLLARS

Security features. Details on back.

San Francisco Planning Department
Clerk of the Board of Supervisors
1 Dr. Carlton B Goodlett Place, Room 244
San Francisco, CA 94102

AUTHORIZED SIGNATURE

MEMO 2000 Oakdale Appeal

[redacted]