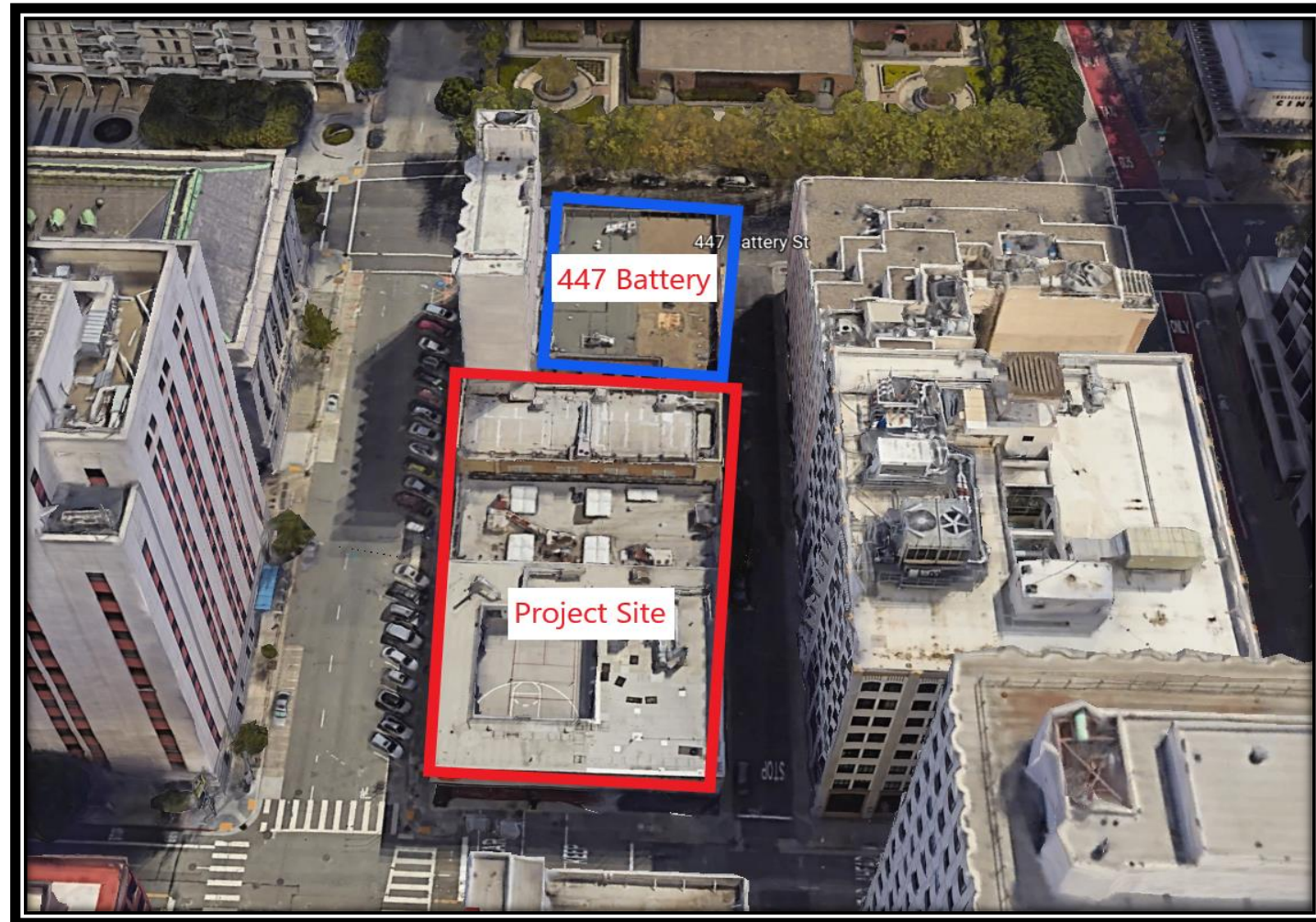


447 Battery Street

- 447 Battery directly adjacent to 530 Sansome
- Proposed similar size and scope hotel project, EIR required
- 447 Partners worked closely with neighbors to resolve issues over last six years
- 530 Sansome project will cause significant impacts to our building



MND Based on Flawed Assumptions

- MND only appropriate where there will be “clearly no significant effect”
- Analysis based on flawed assumption 447 Battery will be demolished
- Significant impacts to historic resources, traffic, and safety
- Inappropriately defers mitigation



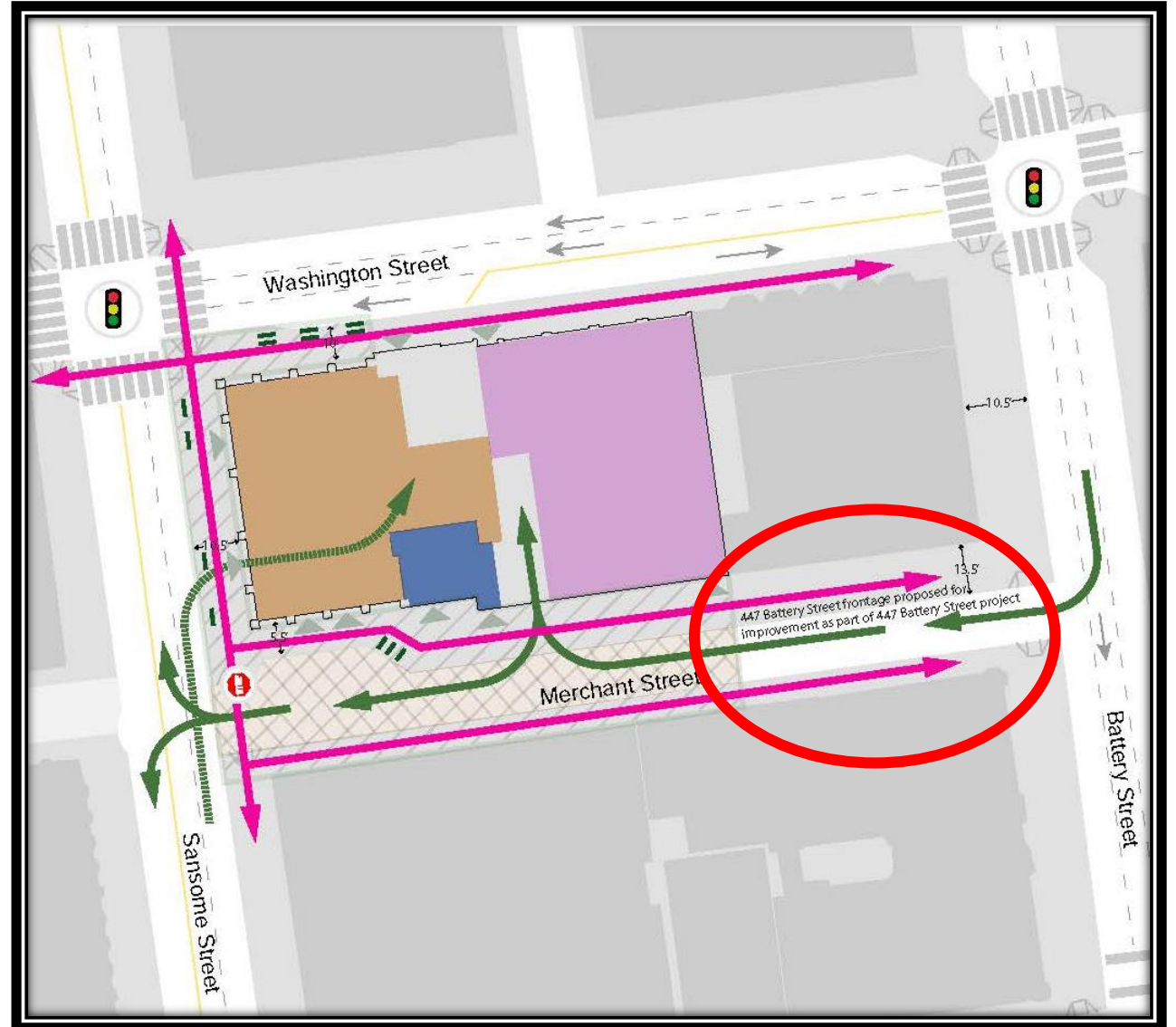
Historic Impacts

- HRE did not recognize potential landmark status of 447 Battery
- Did not evaluate context of adjacent potential landmark
- Evaluation of historic impacts not possible until landmarking process is final



Traffic and Safety Impacts

- Traffic study assumes 447 Battery project will be built
- Relies on shared POPOS safety features
- 530 Sansome POPOS will require redesign



Vibration Mitigation Deferred

- Maximum vibration level to be determined in the future
- All construction equipment causes vibration levels above impact threshold of .25 PPV
- Impacts to 447 Battery significant and unavoidable

Table 12 Vibration Levels from Construction Equipment

Equipment	Approximate PPV (inch per second)		
	5 feet (423 Washington Street, 447 Battery Street)	10 feet	25 feet (FTA reference Level)
Vibratory Compactor	1.23	0.58	0.21
Caisson Drill	0.523	0.243	0.089
Loaded Trucks	0.44	0.208	0.076

SOURCES: FTA, 2018; ESA, 2021.

NOTES: Dark-gray-shaded and light-gray-shaded vibration levels exceed the criteria for historic structures only.

PPV = peak particle velocity

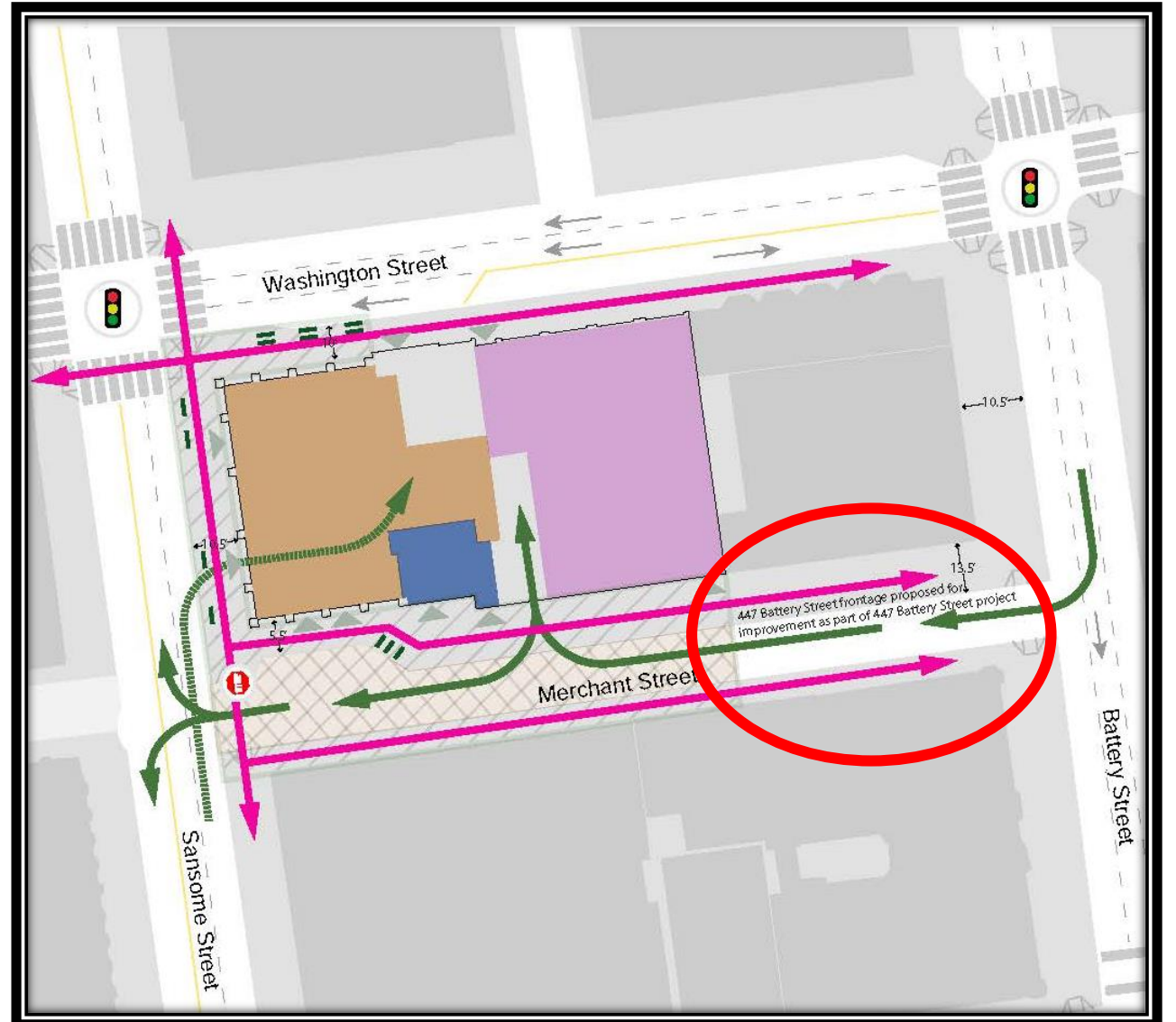
Defers Geotechnical Analysis

- Recommendations not final, requires further investigation
- Impacts to 447 Battery foundation from dry rot and building settlement caused by dewatering not identified

The proposed excavation will likely extend deeper than the bottom of the foundations of the adjacent structures, with the exception of the piles supporting the building at 447 Battery Street. As a result, the neighboring buildings will likely need to be underpinned. Alternatively, if underpinning is not feasible, the shoring system could be designed with adequate strength to resist the surcharge pressures from the adjacent buildings and with adequate stiffness to limit deflections to acceptable levels. Further investigation into the type and depth of foundations as well as the basement configuration of the adjacent buildings should be performed to better understand constraints on the proposed shoring system and permanent basement walls.

Defers POPOS Programming

- POPOS program to be developed and approved in the future
- Initial design based on shared features with 447 Battery
- Design is not feasible without 447 Battery project



Conclusion

- MND violates CEQA
- Based on flawed assumptions
- EIR and additional mitigation required

