



# SAN FRANCISCO PLANNING DEPARTMENT

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## Planning Commission Motion No. 20727

HEARING DATE: MAY 28, 2020

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*Record No.:* 2016-014802SHD  
*Project Address:* 98 FRANKLIN STREET  
*Zoning:* C-3-G (Downtown General Commercial) Zoning District  
85-X // 120/365-R-2 Height and Bulk District  
Van Ness & Market Residential Special Use District  
Downtown and Market & Octavia Plan Areas  
*Block/Lot:* 0836 / 008, 009 & 013  
*Project Sponsor:* Jim Abrams  
J. Abrams Law, P.C.  
One Maritime Plaza, Suite 1900  
San Francisco, CA 94111  
*Property Owner:* 98 Franklin Street, LLC  
150 Oak Street, 4<sup>th</sup> Floor  
San Francisco, CA 94102  
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ADOPTING FINDINGS, WITH THE RECOMMENDATION FROM THE GENERAL MANAGER OF THE RECREATION AND PARKS DEPARTMENT, IN CONSULTATION WITH THE RECREATION AND PARK COMMISSION, THAT NET NEW SHADOW CAST UPON FOUR (4) PROPERTIES UNDER THE JURISDICTION OF THE RECREATION AND PARK DEPARTMENT (KOSHLAND COMMUNITY PARK, PAGE AND LAGUNA MINI PARK, PATRICIA'S GREEN AND THE FUTURE 11<sup>TH</sup>/NATOMA PARK SITE) BY THE PROPOSED PROJECT THAT INCLUDES NEW CONSTRUCTION ON AN EXISTING SURFACE PARKING LOT OF A NEW 36-STORY MIXED-USE BUILDING REACHING A ROOF HEIGHT OF UP TO 365 FEET TALL (396'8" INCLUSIVE OF ROOFTOP SCREENING/MECHANICAL EQUIPMENT) WITH APPROXIMATELY 524,014 GROSS SQUARE FEET, INCLUDING APPROXIMATELY 379,003 GROSS SQUARE FEET OF RESIDENTIAL USE WITHIN A TOWER SITUATED ATOP A 5-STORY PODIUM CONTAINING APPROXIMATELY 84,815 GROSS SQUARE FEET OF INSTITUTIONAL USE (FRENCH AMERICAN INTERNATIONAL SCHOOL) AND APPROXIMATELY 3,229 GROSS SQUARE FEET OF RETAIL USES, LOCATED AT 98 FRANKLIN STREET, LOTS 008, 009 & 013 OF ASSESSOR'S BLOCK 0836, WITHIN THE C-3-G (DOWNTOWN GENERAL COMMERCIAL) ZONING DISTRICT AND 85-X // 365-R-2 HEIGHT AND BULK DISTRICT WOULD NOT BE ADVERSE TO THEIR USE.

### PREAMBLE

Under Planning Code Section 295, 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 ("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.

In 1989, the Recreation and Park Commission and Commission jointly adopted a memorandum ("1989 Memorandum") which identified quantitative and qualitative criteria for determinations of significant shadows in parks under the jurisdiction of the Recreation and Park Department. On February 7, 1989, the Recreation and Park Commission and the Commission adopted criteria establishing absolute cumulative limits for additional shadows on fourteen parks throughout San Francisco (Commission Resolution No. 11595). The 1989 Memorandum established generic criteria for determining a potentially permissible quantitative limit for additional shadows, known as the absolute cumulative limit, for parks not expressly named in the 1989 Memorandum. The qualitative criteria includes existing shadow profiles, important times of day and seasons in the year associated with the park's use, the size and duration of new shadows, and the public good served by the buildings casting new shadow.

On or after December 21, 2017, Jim Abrams (hereinafter "Project Sponsor") submitted the following applications with the Planning Department (hereinafter "Department") in association with the proposed project (hereinafter "Project"): Downtown Project Authorization; Shadow Analysis; and Transportation Demand Management. The Project site (hereinafter "Site") is property at 98 Franklin Street, located on the east side of Franklin Street between Market and Oak Streets; Lots 008, 009 & 013 in Assessor's Block 0836. The Project includes the construction of a new 36-story mixed-use building reaching a roof height up to 365 feet tall (396'8" inclusive of rooftop screening/mechanical equipment). The Project includes a total of approximately 524,014 gross square feet of uses, with approximately 379,003 gross square feet of residential use (at least 345 dwelling units situated on floors 7 through 36) situated atop a 5-story podium containing approximately 84,815 square feet of school use (French American International High School) and approximately 3,229 square feet of retail, 306 Class 1 and 57 Class 2 bicycle parking spaces, and three below-grade levels that would accommodate up to 111 vehicle parking and 3 car share spaces provided for the residential and school uses. The Site is located within the C-3-G Zoning District and the 85-X // 120/365-R-2 Height and Bulk District.

A Shadow Study was prepared by qualified consultants ("Prevision Design") on February 11, 2019 that analyzed the potential shadow impacts of the Project to properties under the jurisdiction of the RPD (Case No. 2016-014802SHD). The analysis was conducted according to criteria and methodology as described in (1) the February 3, 1989 memorandum titled "Proposition K – The Sunlight Ordinance" ("the 1989 memorandum") prepared by RPD and the Department. (2) the July 2014 memorandum titled "Shadow Analysis Procedures and Scope Requirements" ("the 2014 memorandum") prepared by the Department, and (3) direction from Current Planning staff and RPD staff regarding the appropriate approach, deliverables, and scope of analysis appropriate in consideration of the open spaces affected.

The Shadow Study indicated that the Project would cast new shadows on the following four (4) properties under the jurisdiction of RPD: Koshland Community Park; Patricia's Green; Page & Laguna Mini Park; and the future 11<sup>th</sup>/Natoma Park Site, which were not named in the 1989 Memorandum.

Following guidance from the 1989 Memorandum, the existing conditions of the four affected park sites are as follows:

- Koshland Community Park is classified as a small park which is shadowed less than 20 percent of the time during the year. Per the 1989 Memorandum, there is no quantitative standard (limit) for additional shadows beyond the qualitative criteria of the 1989 Memorandum.
- Patricia's Green is classified as a small park which is shadowed less than 20 percent of the time during the year. Per the 1989 Memorandum, there is no quantitative standard (limit) for additional shadows beyond the qualitative criteria of the 1989 Memorandum.
- Page & Laguna Mini Park is classified as a small park which is shadowed approximately 50.80 percent of the time during the year. Per the 1989 Memorandum, there is no quantitative standard (limit) for additional shadows beyond the qualitative criteria of the 1989 Memorandum.
- The future 11<sup>th</sup>/Natoma Park Site is a future park site which is shadowed approximately 22.09 percent of the time during the year.

On March 12, 2020, the Department published a responses to comments document making a quantitative correction to Project shadowing on Koshland Community Park, Patricia's Green and the future 11<sup>th</sup>/Natoma park site to account for Project design revisions related to a parapet measuring approximately 32 feet above the proposed roofline.

### **Koshland Community Park**

The Koshland Community Park is a 0.82-acre (35,743 sf) urban park, located in the Western Addition neighborhood, occupies the northwest corner of the block and is bounded by Page Street to the north, Buchanan Street to the west, and private development along its eastern and southern borders. The park is not fenced, and the posted hours of operation are from sunrise to sunset. Entrances to Koshland Community Park are through a gate and stairs on Page Street as well as several points along Buchanan Street. The pathway diagonally bisects the upper and lower halves of the park. A half-court basketball area and playground sit on the Koshland Community Park's highest elevation and a community garden which can be accessed via terraced steps, a serpentine pathway, or several steps through the Page Street entrance occupies the sites eastern most border. A playground area featuring jungle gym and sand pit is centrally located in the park, which includes a tire swing, slide, and monkey bars. A community garden with vegetables, flowers and shrubbery occupies the eastern border of the park.

Under current conditions, the park receives 20,546,248 annual sfh of shadow. Based on a calculated TAAS of 133,014,951 sfh, Koshland Community Park's existing annual shadow load is 15.45 percent of its TAAS. Existing shadow patterns include very low levels of shadow falling throughout most of the day until late afternoon, when the western half of the park is cast in shadow. Spring and fall follow a similar pattern with most shadow falling over winter months.

The Project would result in net new shadow cast on Koshland Community Park, adding 3,963 net new annual sfh of shadow and increasing the sfh of shadow by 0.003% annually above current levels. This increase would result in a new annual total shadow load of 15.45%. Net new shadow from the Project would occur within the first nine minutes of the daily analysis period between approximately April 20 and August 22nd.

The portions of Koshland Community Park that would receive net new shadow include a portion of the community garden area in the northeastern corner of the park and a wooded area in the southeastern corner of the park. The features which could be of somewhat higher sensitivity include the community garden area, however this feature would only receive net new shadow over spring and summer in the early mornings for a short duration prior 7:15 a.m., times where lower levels of park use would be likely.

### **Patricia's Green**

Patricia's Green is a 0.41-acre (17,903 sf) urban park, located in the Western Addition/Hayes Valley neighborhood, extends generally north-south and is bounded by Octavia Street to the east and west, Hayes Street to the north, and Fell Street to the south. The park is divided into three sections. In the northern section of the park there is a picnic seating area located along Hayes Street. It features a plaza with four picnic tables around a mature tree and a mix of wooden and concrete benches. Two additional picnic tables are located on the western side of this area along Octavia Street next to restaurants. The central section is located where the park intersects Linden Street. It contains a circular plaza with four concrete benches and eight bollards, and functions as the area for art installations. To the north and south of the center plaza are lawns. The southern section of the park contains a children's play area, which features a dome structure with ropes and bars for climbing and poured rubber safety paving. Low concrete square pillars delineate the play area and lawn, and a metal fence encloses the Fell Street side. A service building is located at the southwest corner of the park. On the periphery of the park are concrete ledges and benches interspersed with approximately 24 trees and plantings.

Under current conditions the park receives 12,029,000 annual sfh of shadow. Based on a calculated TAAS of 66,622,661 sfh, Patricia's Green's existing annual shadow load is 18.06 percent of its TAAS. The park currently experiences higher levels of shading in the early mornings and late afternoons but is otherwise predominantly unshaded from late morning through midafternoon year-round.

The Project would result in net new shadow cast on Patricia's Green, adding 298,323 net new annual sfh of shadow and increasing the sfh of shadow by 0.45% annually above current levels. This increase would result in a new annual total shadow load of 18.51%. Net new shadow from the Project would occur within the first 52 minutes of the daily analysis period between February 2nd and March 28th and again between September 14th and November 7th.

Nearly all portions of Patricia's Green would receive net new shadow from the Project. The portions of Patricia's Green that would likely be most sensitive to the addition of net new shadow would be the children's play area, the park's fixed benches, and the tables and seating areas. All these features would receive some net new shadow, the presence of which would be noticeable to users of the park present at

that time. The timing of net new Project shadow would be in the early morning prior to 9:00 a.m., and the children's play area, which would potentially be the most sensitive to additional shadow, would not receive net new shadow at any point later than 8:30 a.m., corresponding to times where lower overall levels of use would be typical.

### **Page & Laguna Mini Park**

Page and Laguna Mini Park is a 6,600-sf urban park located in the Western Addition neighborhood and is under the jurisdiction of the RPD. It is located mid-block with residences east and west and is bounded by Page Street to the north and Rose Street to the south. Page and Laguna Mini Park is enclosed by fences, one along Rose Street and another that bisects the site from east to west. Posted signage indicates that the park hours are from 6 a.m. to 10 p.m. The mini park has two entrances, one on Page Street and one on Rose Street. The entrances are connected by a path, creating a pedestrian connection between the two streets. The mini park features two fixed benches, a designated community gardening area, and several trees ranging in size from small shrubbery to deciduous trees with larger canopies.

Under current conditions the park receives 12,469,084 annual sfh of shadow. Based on a calculated TAAS of 24,543,248 sfh, Page and Laguna Mini Park's existing annual shadow load is 50.80 percent of its TAAS. Existing shadow patterns include morning, afternoon, and evening shadow falling over the majority the park with little shadow around midday, year-round.

The Project would result in net new shadow cast on Page & Laguna Mini Park, adding 12,565 net new annual sfh of shadow and increasing the sfh of shadow by 0.05% annually above current levels. This increase would result in a new annual total shadow load of 50.85%. Net new shadow from the Project would occur within the first 22 minutes of the daily analysis period between approximately May 18 and July 25. Net new shadow would fall only on the northern edge of the park, affecting one public entry point, a portion of the paved walkways, one fixed bench, some grassy or landscaped areas, and a small section of the community garden.

The portions of Page & Laguna Mini Park that could be characterized as being of higher sensitivity include the community garden and the fixed bench; however, shadow cast by the Project would occur in the summer for a short duration (33 minutes or less) and be gone prior to 8 a.m., corresponding to times of typically lower levels of park use.

### **Future 11<sup>th</sup>/Natoma Park Site**

In 2017 RPD acquired a property on 11<sup>th</sup> Street between Minna and Natoma streets. The site is currently occupied by buildings that would be demolished as part of converting this site to a future park. The programming of the park, environmental review, permitting, and timing of construction are not known at this time, but the site for this contemplated future park is analyzed quantitatively and graphically in this section as it is under the jurisdiction of RPD and information is included for informational purposes.

Under current conditions the location of the proposed future park would receive (assuming the removal of existing buildings on site and full use of the site for a park) 16,085,624 annual sfh of shadow. Based on a

calculated TAAS of 72,829,287 sfh, the 11<sup>th</sup>/Natoma Park Site's existing annual shadow load would be 22.09 percent of its TAAS. Existing shadow patterns include early morning and later afternoon shadow falling over the majority of the park, with little to no midday and early afternoon shadow year-round.

The Project would result in net new shadow cast on the 11<sup>th</sup>/Natoma Park Site, adding approximately 130,635 net new annual sfh of shadow and increasing the sfh of shadow by 0.18 percent annually above current levels. This increase would result in a new annual total shadow load of 22.27 percent. Net new shadow from the Project would occur in the late afternoon/early evening (approximately 7pm) for up to 33 minutes between approximately May 4 and August 8. Net new shadow would fall only on the southern half of the park.

As the 11<sup>th</sup>/Natoma Park site is not yet a park and no future programming information has been developed nor approved, the possible features affected and qualitative impacts of project-generated shadow on such features are not determinable.

The Department determined that an environmental impact report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on May 23, 2018. Environmental review for the Project, as well as a separate private development project at 30 Van Ness Avenue, was coordinated with the City's Hub Plan, which would amend the 2008 Market and Octavia Area Plan of the San Francisco General Plan for the easternmost portions of the Market and Octavia Area Plan, including the Site. The Department provided public notice of that determination by publication in a newspaper of general circulation on May 23, 2018. The Department held a public scoping meeting on June 12, 2018 in order to solicit public comment on the scope of the project's environmental review.

On July 24, 2019, the Department published the draft EIR (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment, and of the date and time of the Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on July 24, 2019. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the Site on July 24, 2019.

The EIR contains both analysis at a "program-level" pursuant to CEQA Guidelines section 15168 for adoption and implementation of the Hub Plan, and "project-level" environmental review for the Hub Plan streetscape and street network improvements, the individual development project at 30 Van Ness Avenue, and the Project. This EIR also evaluates the designation of portions or all of the Hub Plan area as a housing sustainability district ("HSD"), in accordance with Assembly Bill 73 (Government Code sections 66202 to 66210 and Public Resources Code sections 21155.10 and 21155.11). Designation of an HSD, through adoption of an ordinance by the San Francisco Board of Supervisors, would allow the City and County of San Francisco ("City") to exercise streamlined ministerial approval of residential and mixed-use development projects meeting certain requirements within the HSD.

On July 24, 2019, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, and to government agencies, the latter both directly and

through the State Clearinghouse. A notice of completion was filed with the State Secretary of Resources via the State Clearinghouse on July 24, 2019.

The Historic Preservation Commission held a duly advertised hearing on said DEIR on August 8, 2018 at which the Historic Preservation Commission formulated its comments on the DEIR.

The Commission held a duly advertised public hearing on said DEIR on August 29, 2019 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on September 9, 2019.

The Department prepared responses to comments on environmental issues received during the 46-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected clerical errors in the DEIR. This material was presented in a responses to comments document, published on March 12, 2020, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.

The Department prepared a final EIR (hereinafter "FEIR") consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the responses to comments document, all as required by law.

On February 13, 2020, the Commission adopted Resolutions 20653 through 20656 to initiate legislation entitled (1) Ordinance amending the General Plan to amend the Market and Octavia Plan, (2) Ordinance amending the Planning Code to update the Market and Octavia Area Plan, (3) Ordinance amending the zoning map to change the land use, zoning, and height and bulk classifications in the Hub Plan area, respectively, and (4) Ordinance amending the Business and Tax Regulations and Planning Code to create the HUB Housing Sustainability District.

On May 21, 2020, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting regarding (1) the General Plan Amendment amending to amend the Market and Octavia Plan; and (2) the ordinance amending the Planning Code to update the Market and Octavia Area Plan, (3) Ordinance amending the zoning map to change the land use, zoning, and height and bulk classifications in the Hub Plan area, respectively, and (4) Ordinance amending the Business and Tax Regulations and Planning Code to create the HUB Housing Sustainability District.

On May 21, 2020, the Commission reviewed and considered the information contained in the FEIR and hereby found that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The FEIR was certified by the Commission on May 21, 2020, by adoption of Motion No. 20707.

On May 21, 2020, through Motion No. 20707, the Commission approved findings required by CEQA, including adoption of a Mitigation Monitoring and Reporting Program (MMRP), under Case No. 2015-

000940ENV, for approval of the Hub Plan ("Hub CEQA Findings"), which findings are incorporated by reference as though fully set forth herein.

On May 21, 2020, the Commission adopted Resolutions 20709 through 20712 to recommend that the Board of Supervisors approve: (1) an Ordinance amending the General Plan to amend the Market and Octavia Plan; (2) an Ordinance amending the Planning Code to update the Market and Octavia Area Plan; (3) an Ordinance amending the zoning map to change the land use, zoning, and height and bulk classifications in the Hub Plan area, respectively; and (4) an Ordinance amending the Business and Tax Regulations and Planning Code to create the HUB Housing Sustainability District.

On May 21, 2020, the General Manager of the Recreation & Parks Department, in consultation with the Recreation and Park Commission, recommended to the Commission that the shadows cast by the Project on four (4) properties under the jurisdiction of the Recreation & Parks Department (Koshland Community Park; Patricia's Green; Page & Laguna Mini Park; and the future 11<sup>th</sup>/Natoma park site) would not be adverse to the use of those properties. (Recreation and Park Commission Resolution No. 2005-008).

On May 28, 2020, through Motion No. 20726, the Commission approved findings required by CEQA, including adoption of a Mitigation Monitoring and Reporting Program (MMRP), under Case No. 2016-014802ENV, for approval of the Project, which findings are found in "Attachment A" to this Motion No. 20727 and incorporated by reference as though fully set forth herein.

The Commission has reviewed and considered reports, studies, plans and other documents pertaining to the Project.

The Commission has 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.

## **FINDINGS**

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

1. The foregoing recitals are accurate and constitute findings of this Commission.
2. The additional shadow cast by the Project would not be adverse and is not expected to interfere with the use of the four (4) properties under the jurisdiction of the Recreation & Parks Department (Koshland Community Park; Patricia's Green; Page & Laguna Mini Park; or the future 11<sup>th</sup>/Natoma park site) for the following reasons:
  - a. The magnitude of the additional shadow on each open space is well below one percent of TAAS on an annual basis, and amounts to a reasonable and small loss of sunlight for a park in an area intended for increased building heights and residential density.

- b. The Project would result in net new shadow cast on Koshland Community Park, adding 3,963 net new annual sfh of shadow and increasing the sfh of shadow by 0.003% annually above current levels. This increase would result in a new annual total shadow load of 15.45%. The portions of Koshland Community Park that would receive net new shadow include a portion of the community garden area in the northeastern corner of the park and a wooded area in the southeastern corner of the park. The features which could be of somewhat higher sensitivity include the community garden area, however this feature would only receive net new shadow over spring and summer in the early mornings for a short duration prior 7:15 a.m., times where lower levels of park use would be likely.
- c. The Project would result in net new shadow cast on Patricia's Green, adding 298,323 net new annual sfh of shadow and increasing the sfh of shadow by 0.45% annually above current levels. This increase would result in a new annual total shadow load of 18.51%. The portions of Patricia's Green that would likely be most sensitive to the addition of net new shadow would be the children's play area, the park's fixed benches, and the tables and seating areas. All these features would receive some net new shadow, the presence of which would be noticeable to users of the park present at that time; however, the timing of net new Project shadow would be in the early morning prior to 9:00 a.m., and the children's play area, which would potentially be the most sensitive to additional shadow, would not receive net new shadow at any point later than 8:30 a.m., corresponding to times where lower overall levels of use would be typical.
- d. The Project would result in net new shadow cast on Page & Laguna Mini Park, adding 12,565 net new annual sfh of shadow and increasing the sfh of shadow by 0.05% annually above current levels. This increase would result in a new annual total shadow load of 50.85%. Net new shadow would fall only on the northern edge of the park, affecting one public entry point, a portion of the paved walkways, one fixed bench, some grassy or landscaped areas, and a small section of the community garden. The portions of Page & Laguna Mini Park that could be characterized as being of higher sensitivity include the community garden and the fixed bench; however, shadow cast by the Project would occur in the summer for a short duration (33 minutes or less) and be gone prior to 8 a.m., corresponding to times of typically lower levels of park use.
- e. The 98 Franklin Street Project would result in net new shadow cast on the 11<sup>th</sup>/Natoma Park Site, adding approximately 130,635 net new annual sfh of shadow and increasing the sfh of shadow by 0.18 percent annually above current levels. This increase would result in a new annual total shadow load of 22.27 percent. Net new shadow would fall only on the southern half of the park. The 11<sup>th</sup>/Natoma Park site is not yet a park and no future programming information has been developed nor approved. The shadow cast by the Project would occur after approximately 7 pm in the spring and summer and is not likely to frustrate forthcoming planning efforts for the future park.

3. The Project implements the vision of the Market and Octavia Area Plan through the construction of 345 dwelling units with 20% provided as on-site affordable units (Below Market Rate), approximately 84,815 gross square feet of school use, and 3,229 of retail use. The Project's institutional use (school) and commercial use (retail) will provide educational and new employment opportunities within an intense, walkable urban context.
4. The findings of the Commission in this motion do not constitute an approval of the Project.

**DECISION**

That based upon the Record, the submissions by the Applicant, the staff of the Department, the recommendation of the General Manager of the Recreation and Parks Department, in consultation with the Recreation and Park Commission, and other interested parties, the oral testimony presented to Commission at the public hearings, and all other written materials submitted by all parties, the Commission hereby **DETERMINES**, under Shadow Analysis Application No. 2016-014802SHD, that the net new shadow cast by the Project will not be adverse to the use of four (4) properties under the jurisdiction of the Recreation & Parks Department (Koshland Community Park; Patricia's Green; Page & Laguna Mini Park; or future 11<sup>th</sup>/Natoma park site).

I hereby certify that the Commission ADOPTED the foregoing Motion on May 28, 2020.



Jonas P. Ionin  
Commission Secretary

AYES: Koppel, Moore, Fung, Johnson, Imperial, Diamond, Chan

NAYS: None

ABSENT: None

ADOPTED: May 28, 2020