



EXECUTIVE SUMMARY Conditional USE

HEARING DATE: OCTOBER 15, 2020

CONSENT

Record No.:	2020-003825CUA
Project Address:	390 Valencia Street
Zoning:	Residential Transit Oriented-Mission (RTO-M) Zoning District
	45-X Height and Bulk District
Block/Lot:	3546/002
Project Sponsor:	Roy Phillips, REP Energy, Inc.
	936 B 7th Street, Ste 311
	Novato, CA 94945
Property Owner:	Mission Housing Development Corporation
	474 Valencia St., Suite 280
	San Francisco, CA 94103
Staff Contact:	Alex Westhoff – (628) 652-7314
	alex.westhoff@sfgov.org

Recommendation: Approval with Conditions

Project Description

The Project includes installation of two Energy Storage, NEM 3R, UL Certified enclosures within the existing housing complex (aka. Valencia Garden Apartments) with 260-units. The primary purpose of the Energy Storage is to store existing Photovoltaic (PV) capacity and to discharge when needed for grid stabilization. This will allow increased PV capacity on this circuit.

Required Commission Action

In order for the Project to proceed, the Commission must grant a Conditional Use Authorization-Planned Unit Development, pursuant to Planning Code Sections 209.4, 303 and 304, to allow a utility installation within an existing 260-unit housing complex within the RTO-M Zoning District.

Issues and Other Considerations

- Public Comment & Outreach.
 - **Support/Opposition:** To date, the Planning Department has received no correspondence from the public in support or opposition to the project.
- **Open Space/Project Impacts:** This Project will result in a 614.8 square feet reduction in open space for the Planned Unit Development. The Project would not impact any of the existing housing units.

Environmental Review

The Project is exempt from the California Environmental Quality Act ("CEQA") as a Class 1 categorical exemption.

Basis for Recommendation

The Department finds that the Project is, on balance, consistent with the Mission Area Plan and the Objectives and Policies of the General Plan. Although the Project results in a loss of open space, the total open space will remain well above the required minimum. The Department also finds the project to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity.

Attachments:

Draft Motion – Conditional Use Authorization with Conditions of Approval (Exhibit A) Exhibit B – Plans and Renderings Exhibit C – Environmental Determination Exhibit D – Maps and Context Photos Exhibit E - Project Sponsor Brief







PLANNING COMMISSION DRAFT MOTION

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ADOPTING FINDINGS RELATING TO A CONDITIONAL USE AUTHORIZATION-PLANNED UNIT DEVELOPMENT PURSUANT TO PLANNING CODE SECTIONS 209.4, 303 AND 304, TO PERMIT TWO ENERGY STORAGE ENCLOSURES WITHIN AN EXISTING HOUSING COMPLEX (AKA. VALENCIA GARDEN APARTMENTS) WITH 260 DWELLING UNITS WITHIN THE RTO-M (RESIDENTIAL TRANSIT ORIENTED-MISSION) ZONING DISTRICT AND 40-X HEIGHT AND BULK DISTRICT, AND ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

PREAMBLE

On February 19, 2020, Roy Phillips of REP Energy, Inc. (hereinafter "Project Sponsor") filed Application No. 2020-003825CUA (hereinafter "Application) with the Planning Department (hereinafter "Department") for a Conditional Use Authorization to install two energy storage enclosures (hereinafter "Project") at 390 Valencia Street, Block 3546 Lot 002 (hereinafter "Project Site").

This Project is exempt from the California Environmental Quality Act ("CEQA") as a Class 1 Categorical Exemption.

On October 15, 2020, the San Francisco Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting on Conditional Use Application No. 2020-003825CUA.

The Planning Department Commission Secretary is the custodian of records; the File for Record No. 2020-003825CUA is located at 49 South Van Ness Avenue, Suite 1400, San Francisco, California.

The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of the applicant, Department staff, and other interested parties.

MOVED, that the Commission hereby authorizes the Conditional Use as requested in Application No. 2020-003825CUA, subject to the conditions contained in "EXHIBIT A" of this motion, based on the following findings:



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 above recitals are accurate and constitute findings of this Commission.
- 2. Project Description. The Project would install two ground-level energy storage enclosures (NEM 3R, UL Certified enclosures), which measure approximately 85 square feet each, within an existing housing complex (aka. Valencia Garden Apartments). These enclosures would store existing photovoltaic (PV) energy to discharge when needed for grid stabilization and allow for increased PV capacity on this circuit. Each of the two storage device areas, of which the enclosures are located within, measure 307.4 square feet, and are sited adjacent to existing garbage collection areas. The Project is funded through a California Energy Commission grant award and will pair the proposed onsite storage facilities with one of the largest PV installations in the City. The Project will also be staged to provide indefinite renewals-driven backup power to critical loads at the site.
- **3. Site Description and Present Use.** The Valencia Garden Apartments (VGA) is a public housing project with 218 family flats and 42 senior apartments among 16 buildings on a five-acre site. The site makes up much of the square city block bounded by 14th Street (north), Valencia Street (east), 15th Street (south), and Guerrero Street (west). VGA includes two narrow alleys, Rosa Parks Lane and Maxwell Court which run through the project site. There is variation in building height throughout VGA, though the project is generally three stories.
- 4. Surrounding Properties and Neighborhood. The Project Site is located within the RTO-M Zoning District and the Mission Area Plan. The immediate surrounding neighborhood is mixed in character with residential, commercial, and institutional uses, generally ranging from 1 to 3 stories, with some taller buildings. Building stock varies and includes historic Victorian, Edwardian, and industrial buildings, as well as more contemporary mixed-use developments. Directly across the street lies the Valencia Street NCT (Neighborhood Commercial Transit) district, with other nearby zoning districts including NCT-3 (Moderate-Scale Neighborhood Commercial Transit), RH-1 (Residential House, One-Family), NC-1 (Neighborhood Commercial Cluster), and UMU (Urban Mixed-Use).
- 5. Public Outreach and Comments. The Department has not received any public correspondence, in support or opposition, to the Project.
- **6. Planning Code Compliance.** The Commission finds that the Project is consistent with the relevant provisions of the Planning Code in the following manner:
 - A. Utility Installation Use. A *Utility Installation* is defined under Planning Code Section 102 as a Utility and Infrastructure Use that includes, but is not necessarily limited to, water, gas, electric, transportation, or communications utilities, or pubic service facility, provided that operating requirements necessitate placement at this location. This use does not include Wireless Telecommunications Service Facilities, or Public Transportation Facilities, as defined in this section of the code. Planning Code Section 209.4 states that Utility Installation uses are conditionally permitted in RTO-M districts.



The Project is providing an accessory utility installation (two energy enclosures) to an existing housing complex.

- **B.** Open Space. The Project would be located in a portion of the designated open space, which is located throughout the site. While a 614.8 square foot loss of open space will occur, an approximate total of 109,385.4 square feet of open space will remain. The total remaining open space exceeds the required minimum open space for a 260-unit development, and the enclosures will not be located in rear yards of any of the units.
- 7. Conditional Use Findings. Planning Code Section 303 establishes criteria for the Planning Commission to consider when reviewing applications for Conditional Use Authorizations. On balance, the project complies with said criteria in that:
 - A. The proposed new uses and building, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable, and compatible with, the neighborhood or the community.

The proposed energy enclosures will have minimal to no negative impacts to the VGA Housing Project or surrounding neighborhood. They will provide clean energy to the 260-unit development located in the heart of San Francisco's Mission District. They will be sited next to the development's garbage collection area, in a location not visible from the streets surrounding the project, and further screened by existing and proposed new fencing. The enclosures will not be located in unit's rear yards or front setbacks, and will not impact exposure for any of the units. While the project will remove approximately 614.8 square feet of open space from the project, VGA will still retain open space well above the minimum required amount.

- B. The proposed project will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity. There are no features of the project that could be detrimental to the health, safety or convenience of those residing or working the area, in that:
 - (1) Nature of proposed site, including its size and shape, and the proposed size, shape and arrangement of structures;

The Project will not modify the existing footprint or envelope of the VGA Housing Project.

(2) The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading;

The Project will have no impact on accessibility and traffic patterns for persons and vehicles.

(3) The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor;

The Project will not emit any offensive emissions. Furthermore, both of the enclosures will be enveloped by a wood fence to match the existing wood fence, to serve as additional screening.



(4) Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs;

The proposed energy enclosures will be situated behind an existing garbage collection area, which is partially screened by existing fences and doors. The enclosures will be further screened by wood fences to match the existing fences.

C. That the use as proposed will comply with the applicable provisions of the Planning Code and will not adversely affect the General Plan.

The Project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan as detailed below.

D. Such use or feature as proposed will provide development that is in conformity with the stated purpose of the applicable Use District.

The Project, located in the RTO-M Zoning District, will help bolster the 260-unit VGA Public Housing project through providing clean energy storage facilities. No housing units will be removed through this project.

8. General Plan Compliance. The Project is, on balance, consistent with the following Objectives and Policies of the General Plan:

HOUSING ELEMENT

Objectives and Policies

OBJECTIVE 1

IDENTIFY AND MAKE AVAILABLE FOR DEVELOPMENT ADEQUATE SITES TO MEET THE CITY'S HOUSING NEEDS, ESPECIALLY PERMANENTLY AFFORDABLE HOUSING.

Policy 1.1

Plan for the full range of housing needs in the City and County of San Francisco, especially affordable housing.

Policy 1.10

Support new housing projects, especially affordable housing, where households can easily rely on public transportation, walking and bicycling for the majority of daily trips.

OBJECTIVE 4

FOSTER A HOUSING STOCK THAT MEETS THE NEEDS OF ALL RESIDENTS ACROSS LIFECYCLES.

Policy 4.1

Develop new housing, and encourage the remodeling of existing housing, for families with children.



Policy 4.5

Ensure that new permanently affordable housing is located in all of the City's neighborhoods, and encourage integrated neighborhoods, with a diversity of unit types provided at a range of income levels.

OBJECTIVE 11

SUPPORT AND RESPECT THE DIVERSE AND DISTINCT CHARACTER OF SAN FRANCISCO'S NEIGHBORHOODS.

Policy 11.1

Promote the construction and rehabilitation of well-designed housing that emphasizes beauty, flexibility, and innovative design, and respects existing neighborhood character.

Policy 11.3

Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character.

OBJECTIVE 12

BALANCE HOUSING GROWTH WITH ADEQUATE INFRASTRUCTURE THAT SERVES THE CITY'S GROWING POPULATION.

Policy 12.2

Consider the proximity of quality of life elements such as open space, child care, and neighborhood services, when developing new housing units.

ENVIRONMENTAL PROTECTION ELEMENT

Objectives and Policies

OBJECTIVE 4

ASSURE THAT THE AMBIENT AIR OF THE SAN FRANCISCO AND THE BAY REGION IS CLEAN.

Policy 4.1

Support and comply with objectives, policies, and air quality standards of the Bay Area Air Quality Management District.

OBJECTIVE 12

ESTABLISH THE CITY AND COUNTY OF SAN FRANCISCO AS A MODEL FOR ENERGY MANAGEMENT.

Policy 12.1

Incorporate energy management practices into building, facility, and fleet maintenance and operations.



OBJECTIVE 13

ENHANCE THE ENERGY EFFICIECY OF HOUSING IN SAN FRANCISCO.

Policy 13.1 Improve the energy efficiency of existing homes and apartment buildings.

Policy 13.5 Emphasize energy conservation in local government housing assistance programs.

AIR QUALITY ELEMENT

Objectives and Policies

OBJECTIVE 1

ADHERE TO STATE AND FEDERAL AIR QUALITY STANDARDS AND REGIONAL PROGRAMS.

Policy 1.1 Cooperate with regional agencies to promote air quality improvement.

Policy 1.2 Adhere to State and Federal air quality standards.

OBJECTIVE 6

LINK THE POSITIVE EFFECTS OF ENERGY CONSERVATION AND WASTE MANAGEMENT INTO EMISSION REDUCTIONS.

Policy 6.1 Encourage emission reduction through energy conservation to improve air quality.

MISSION AREA PLAN

Land Use Objectives and Policies

OBJECTIVE 1.2

IN AREAS OF THE MISSION WHERE HOUSING AND MIXED-USE IS ENCOURAGED, MAXIMIZE DEVELOPMENT POTENTIAL IN KEEPING WITH NEIGHBORHOOD CHARACTER.

Policy 1.2.1 Ensure that in-fill housing development is compatible with its surroundings.

The Project provides clean energy storage for VGA public housing development, which includes units for seniors and families, in the heart of the Mission district. The project will allow for increased photovoltaic capacity on this circuit. This will help ensure a reliable energy source for this 260-unit Public Housing development, thus augmenting the sustainability, resiliency and long-term vitality of this project. As the



storage facility will not be visible from a public right of way, the character of the surrounding neighborhood will not be impacted. The storage facility will not be located in required rear yards, and will have minimal open space impacts to the housing project. The storage facilities will be screened with fencing and thus be further visually buffered for immediately surrounding residents. The energy storage facility will augment what is already one of the largest solar energy projects in San Francisco, thus setting a precedent to further encourage renewable energy projects throughout the City. Renewable energy projects such as this reduce greenhouse gas emissions, thus improving local and regional air quality, and aligning with objectives of the Bay Area Air Quality Management District. Furthermore, this project is funded by a California Energy Commission grant and will support California's Energy Storage Mandate under AB 2514 and AB 2868 through development of alternative energy storage techniques. On balance, the Project is consistent with the Objectives and Policies of the General Plan.

- **9. Planning Code Section 101.1(b)** establishes eight priority-planning policies and requires review of permits for consistency with said policies. On balance, the project complies with said policies in that:
 - A. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses be enhanced.

The Project will support the 260-unit VGA housing complex. While the Project will not directly impact any existing neighborhood-serving retail uses, it will support Mission District residents as potential patrons for neighborhood-serving retail uses.

B. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

The Project will support a Mission District public housing development, and have little to no impacts on neighborhood character. Affordable housing is critical to ensure the City's cultural and economic diversity is maintained.

C. That the City's supply of affordable housing be preserved and enhanced.

The Project helps support a 260-unit public housing project, which includes units for families and seniors. Having a reliable and clean energy source helps to ensure the housing project is an attractive and desirable place to reside in.

D. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking.

The Project will not impede MUNI transit service or overburden streets or neighborhood parking.

E. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.

The Project does not include commercial office development. The Project will support a 260-unit



housing development, thus supporting potential customers who may patronize local industrial and service industries.

F. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake.

The Project will help provide indefinite backup power. This could be critical should other sources of power be lost in earthquakes or other disasters.

G. That landmarks and historic buildings be preserved.

The Project will have no impact on the City's landmarks or historic buildings.

H. That our parks and open space and their access to sunlight and vistas be protected from development.

While the Project will result in a minor loss of open space, the VGA project is still well above the minimum open space requirement. The Project will not be sited in required rear yards of any of the residents. The Project will not impact any public park.

- **10.** The Project is consistent with and would promote the general and specific purposes of the Code provided under Section 101.1(b) in that, as designed, the Project would contribute to the character and stability of the neighborhood and would constitute a beneficial development.
- **11.** The Commission hereby finds that approval of the Conditional Use Authorization would promote the health, safety and welfare of the City.



DECISION

That based upon the Record, the submissions by the Applicant, the staff of the Department and other interested parties, the oral testimony presented to this Commission at the public hearings, and all other written materials submitted by all parties, the Commission hereby **APPROVES Conditional Use Authorization Application No. 2020-003825CUA** subject to the following conditions attached hereto as "EXHIBIT A" in general conformance with plans on file, dated January 16, 2020, and stamped "EXHIBIT B", which is incorporated herein by reference as though fully set forth.

APPEAL AND EFFECTIVE DATE OF MOTION: Any aggrieved person may appeal this Conditional Use Authorization to the Board of Supervisors within thirty (30) days after the date of this Motion. The effective date of this Motion shall be the date of this Motion if not appealed (after the 30-day period has expired) OR the date of the decision of the Board of Supervisors if appealed to the Board of Supervisors. For further information, please contact the Board of Supervisors at (415) 554-5184, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102.

Protest of Fee or Exaction: You may protest any fee or exaction subject to Government Code Section 66000 that is imposed as a condition of approval by following the procedures set forth in Government Code Section 66020. The protest must satisfy the requirements of Government Code Section 66020(a) and must be filed within 90 days of the date of the first approval or conditional approval of the development referencing the challenged fee or exaction. For purposes of Government Code Section 66020, the date of imposition of the fee shall be the date of the earliest discretionary approval by the City of the subject development.

If the City has not previously given Notice of an earlier discretionary approval of the project, the Planning Commission's adoption of this Motion, Resolution, Discretionary Review Action or the Zoning Administrator's Variance Decision Letter constitutes the approval or conditional approval of the development and the City hereby gives **NOTICE** that the 90-day protest period under Government Code Section 66020 has begun. If the City has already given Notice that the 90-day approval period has begun for the subject development, then this document does not re-commence the 90-day approval period.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on October 15, 2020.

Jonas P. Ionin Commission Secretary

AYES:

NAYS:

ABSENT:

ADOPTED: October 15, 2020



EXHIBIT A

Authorization

This authorization is for a conditional use to allow the installation of two energy enclosures at an existing housing complex located at 390 Valencia Street (aka. Valencia Garden Apartments), Block 3546, and Lot 002, pursuant to Planning Code Sections 209.4, 303 and 304, within the RTO-M (Residential Transit Oriented-Mission) Zoning District and a 45-X Height and Bulk District; in general conformance with plans, dated **January 16, 2020**, and stamped "EXHIBIT B" included in the docket for Record No. **2020-003825CUA** and subject to conditions of approval reviewed and approved by the Commission on **October 15, 2020** under Motion No **XXXXXX**. This authorization and the conditions contained herein run with the property and not with a particular Project Sponsor, business, or operator.

Recordation of Conditions Of Approval

Prior to the issuance of the building permit or commencement of use for the Project the Zoning Administrator shall approve and order the recordation of a Notice in the Official Records of the Recorder of the City and County of San Francisco for the subject property. This Notice shall state that the project is subject to the conditions of approval contained herein and reviewed and approved by the Planning Commission on **October 15, 2020** under Motion No **XXXXXX**.

Printing of Conditions of Approval on Plans

The conditions of approval under the 'Exhibit A' of this Planning Commission Motion No. XXXXXX shall be reproduced on the Index Sheet of construction plans submitted with the site or building permit application for the Project. The Index Sheet of the construction plans shall reference to the Conditional Use authorization and any subsequent amendments or modifications.

Severability

The Project shall comply with all applicable City codes and requirements. If any clause, sentence, section or any part of these conditions of approval is for any reason held to be invalid, such invalidity shall not affect or impair other remaining clauses, sentences, or sections of these conditions. This decision conveys no right to construct, or to receive a building permit. "Project Sponsor" shall include any subsequent responsible party.

Changes and Modifications

Changes to the approved plans may be approved administratively by the Zoning Administrator. Significant changes and modifications of conditions shall require Planning Commission approval of a new Conditional Use authorization.



CONDITIONS OF APPROVAL, COMPLIANCE, Monitoring, and reporting

Performance

1. Validity. The authorization and right vested by virtue of this action is valid for three (3) years from the effective date of the Motion. The Department of Building Inspection shall have issued a Building Permit or Site Permit to construct the project and/or commence the approved use within this three-year period.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

2. Expiration and Renewal. Should a Building or Site Permit be sought after the three (3) year period has lapsed, the project sponsor must seek a renewal of this Authorization by filing an application for an amendment to the original Authorization or a new application for Authorization. Should the project sponsor decline to so file, and decline to withdraw the permit application, the Commission shall conduct a public hearing in order to consider the revocation of the Authorization. Should the Commission not revoke the Authorization following the closure of the public hearing, the Commission shall determine the extension of time for the continued validity of the Authorization.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

3. Diligent Pursuit. Once a site or Building Permit has been issued, construction must commence within the timeframe required by the Department of Building Inspection and be continued diligently to completion. Failure to do so shall be grounds for the Commission to consider revoking the approval if more than three (3) years have passed since this Authorization was approved.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

4. Extension. All time limits in the preceding three paragraphs may be extended at the discretion of the Zoning Administrator where implementation of the project is delayed by a public agency, an appeal or a legal challenge and only by the length of time for which such public agency, appeal or challenge has caused delay.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

5. Conformity with Current Law. No application for Building Permit, Site Permit, or other entitlement shall be approved unless it complies with all applicable provisions of City Codes in effect at the time of such approval.



For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

6. Utility Installations & Upgrades. Future utility installations and upgrades may occur at the housing complex and may be reviewed administratively by Department staff, as long as these alterations are compliant with the Planning Code and all other City Codes, and do not require modifications or exceptions to the Planning Code.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

Design – Compliance at Plan Stage

7. Final Materials. The Project Sponsor shall continue to work with Planning Department on the project design. Final materials, glazing, color, texture, landscaping, and detailing shall be subject to Department staff review and approval.

For information about compliance, contact the Case Planner, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

8. Garbage, Composting and Recycling Storage. Space for the collection and storage of garbage, composting, and recycling shall be provided within enclosed areas on the property and clearly labeled and illustrated on the building permit plans. Space for the collection and storage of recyclable and compostable materials that meets the size, location, accessibility and other standards specified by the San Francisco Recycling Program shall be provided at the ground level of the buildings.

For information about compliance, contact the Case Planner, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

Monitoring - After Entitlement

9. Enforcement. Violation of any of the Planning Department conditions of approval contained in this Motion or of any other provisions of Planning Code applicable to this Project shall be subject to the enforcement procedures and administrative penalties set forth under Planning Code Section 176 or Section 176.1. The Planning Department may also refer the violation complaints to other city departments and agencies for appropriate enforcement action under their jurisdiction.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

10. Revocation due to Violation of Conditions. Should implementation of this Project result in complaints from interested property owners, residents, or commercial lessees which are not resolved by the Project Sponsor and found to be in violation of the Planning Code and/or the specific conditions of approval for the Project as set forth in Exhibit A of this Motion, the Zoning Administrator shall refer such complaints to the Commission, after which it may hold a public hearing on the matter to consider revocation of this



authorization.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>

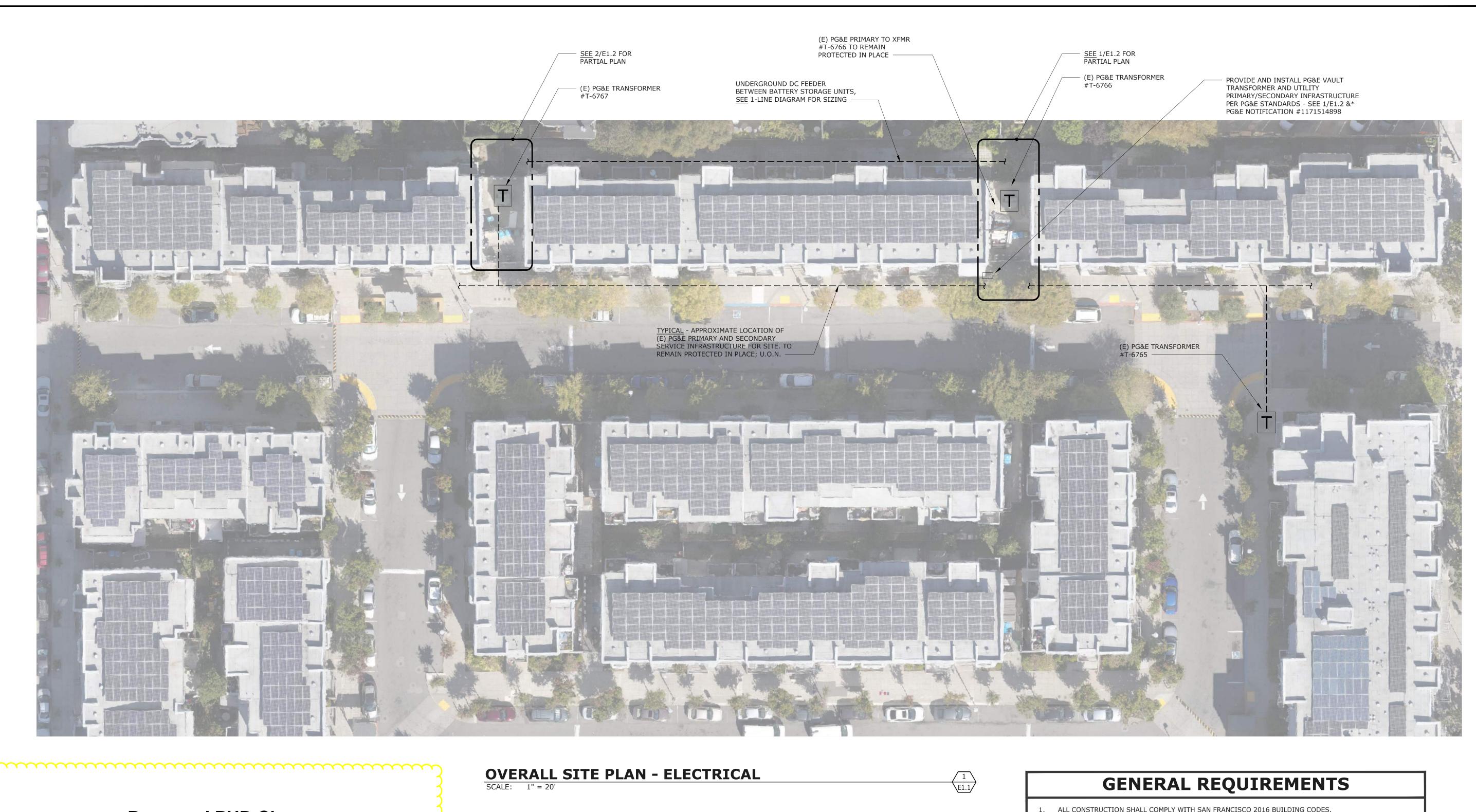
Operation

11. Community Liaison. Prior to issuance of a building permit to construct the project and implement the approved use, the Project Sponsor shall appoint a community liaison officer to deal with the issues of concern to owners and occupants of nearby properties. The Project Sponsor shall provide the Zoning Administrator and all registered neighborhood groups for the area with written notice of the name, business address, and telephone number of the community liaison. Should the contact information change, the Zoning Administrator and registered neighborhood groups shall be made aware of such change. The community liaison shall report to the Zoning Administrator what issues, if any, are of concern to the community and what issues have not been resolved by the Project Sponsor.

For information about compliance, contact Code Enforcement, Planning Department at 628.652.7463, <u>www.sfplanning.org</u>



Exhibit B - Plans



Proposed PUD Changes

Open Space:

East Storage Device Area= 16.66' * 18.45'= 307.4 sq. ft. West Storage Device Area= 16.66' * 18.45'= 307.4 sq. ft.

Current Approximate Open Space= 110,000 sq. ft. Total Reduction in Open Space= 614.8 sq. ft Proposed Approximate Open Space= 109,385.4 sq. ft.

Eastern Electrical Yard Enclosure Front Fence:

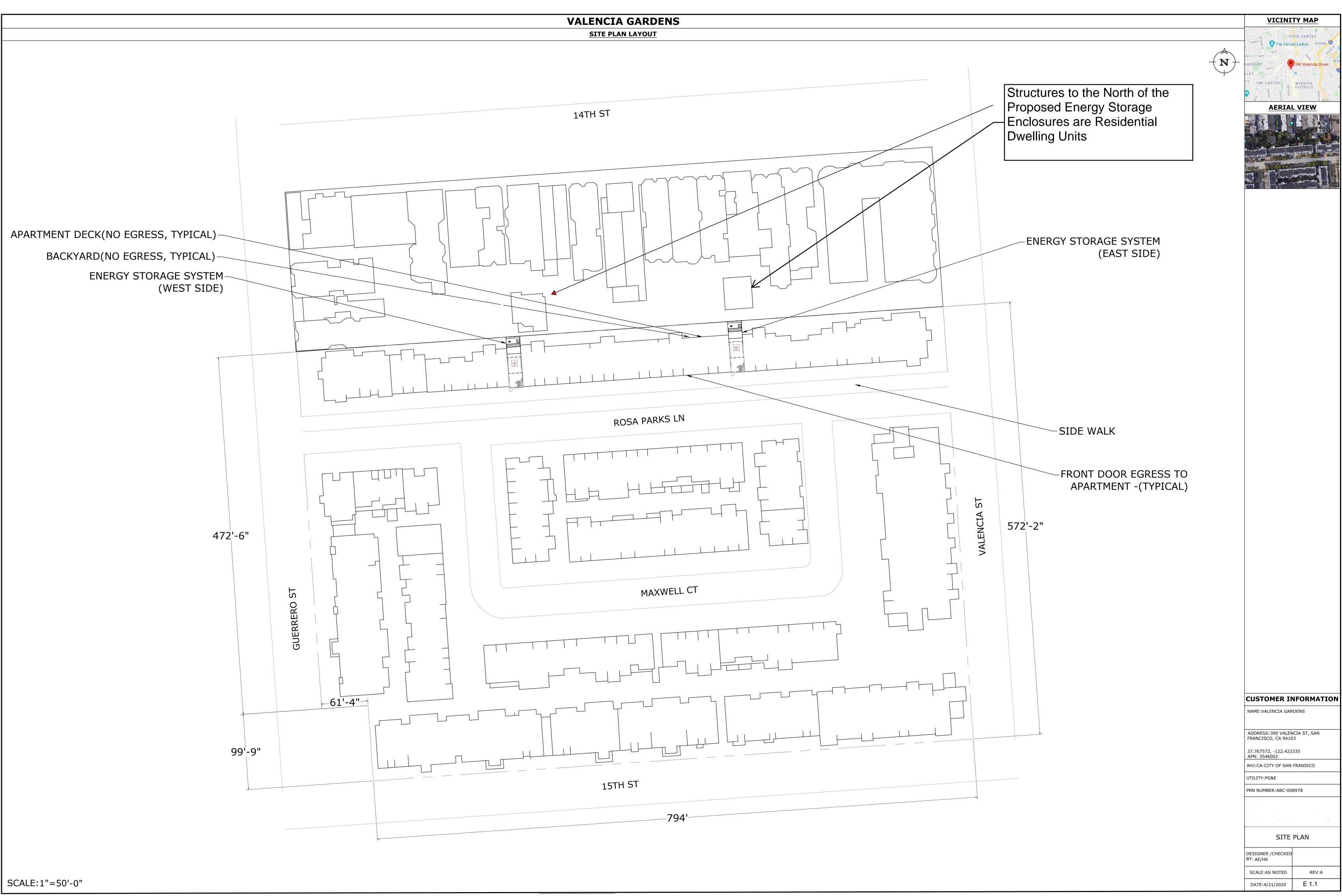
Move Fence Forward 1' 2" to Accommodate Switchgear

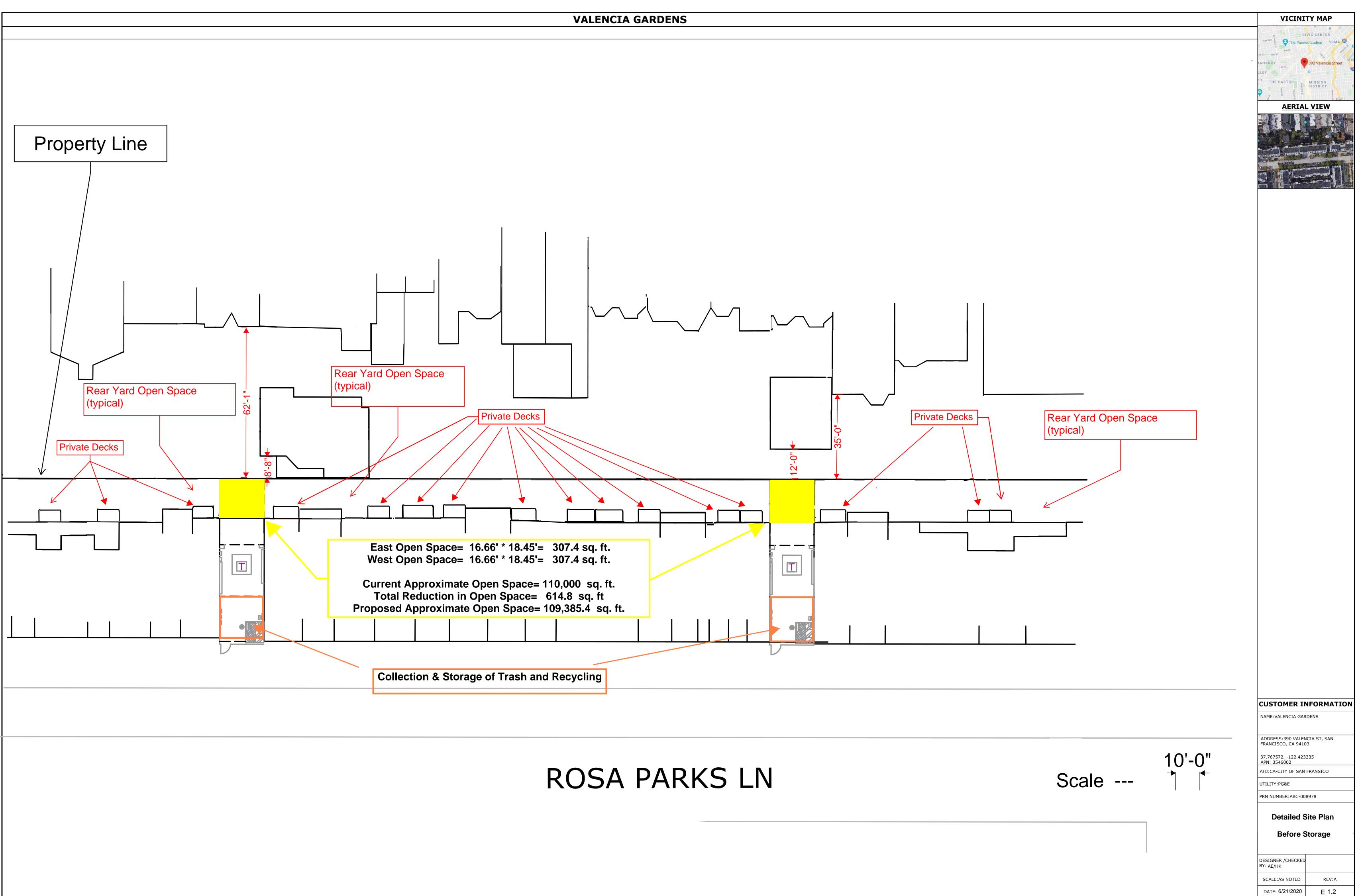
SCOPE OF WORK

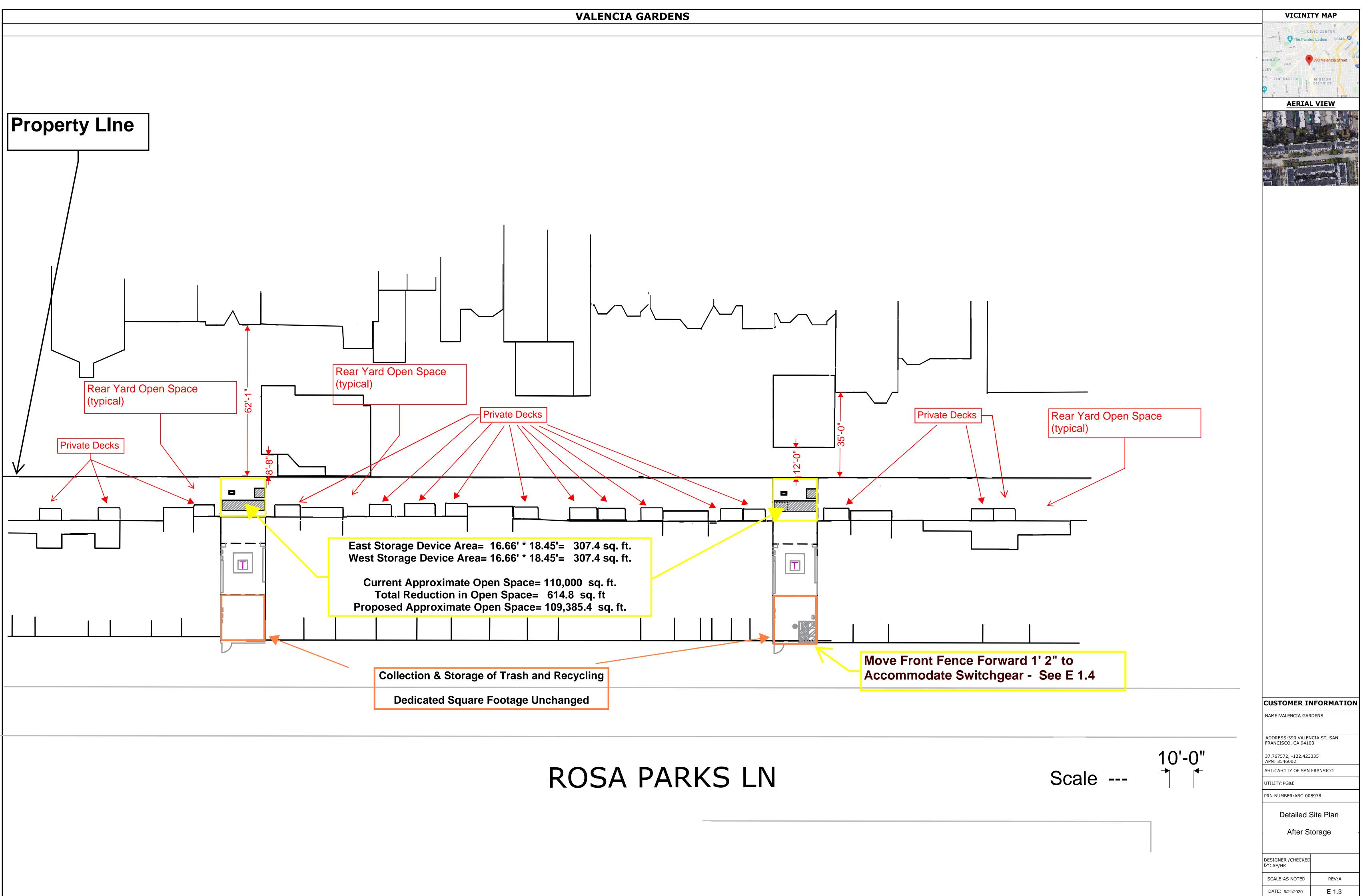
- INSTALLATION OF (2) EXTERIOR 250 KW BATTERY INVERTERS / 548 KWH ENERGY STORAGE ENCLOSURES (SUNGROW ENERGY STORAGE SYSTEM - MODEL# ST548WH-25) SEPARATED BY 210' BETWEEN INSTALLATION LOCATIONS, BATTERY SYSTEM SERVICE ENTRANCE, AND NEW TRANSFORMER VAULT IN SIDEWALK LOCATED AT THE VALENCIA GARDEN'S LOW INCOME HOUSING DEVELOPMENT COMPRISED OF (4) STORIES OF WOOD DEVELOPMENT.
- 2. ALL CONSTRUCTION SHALL COMPLY WITH S.F. 2016 BUILDING CODES.

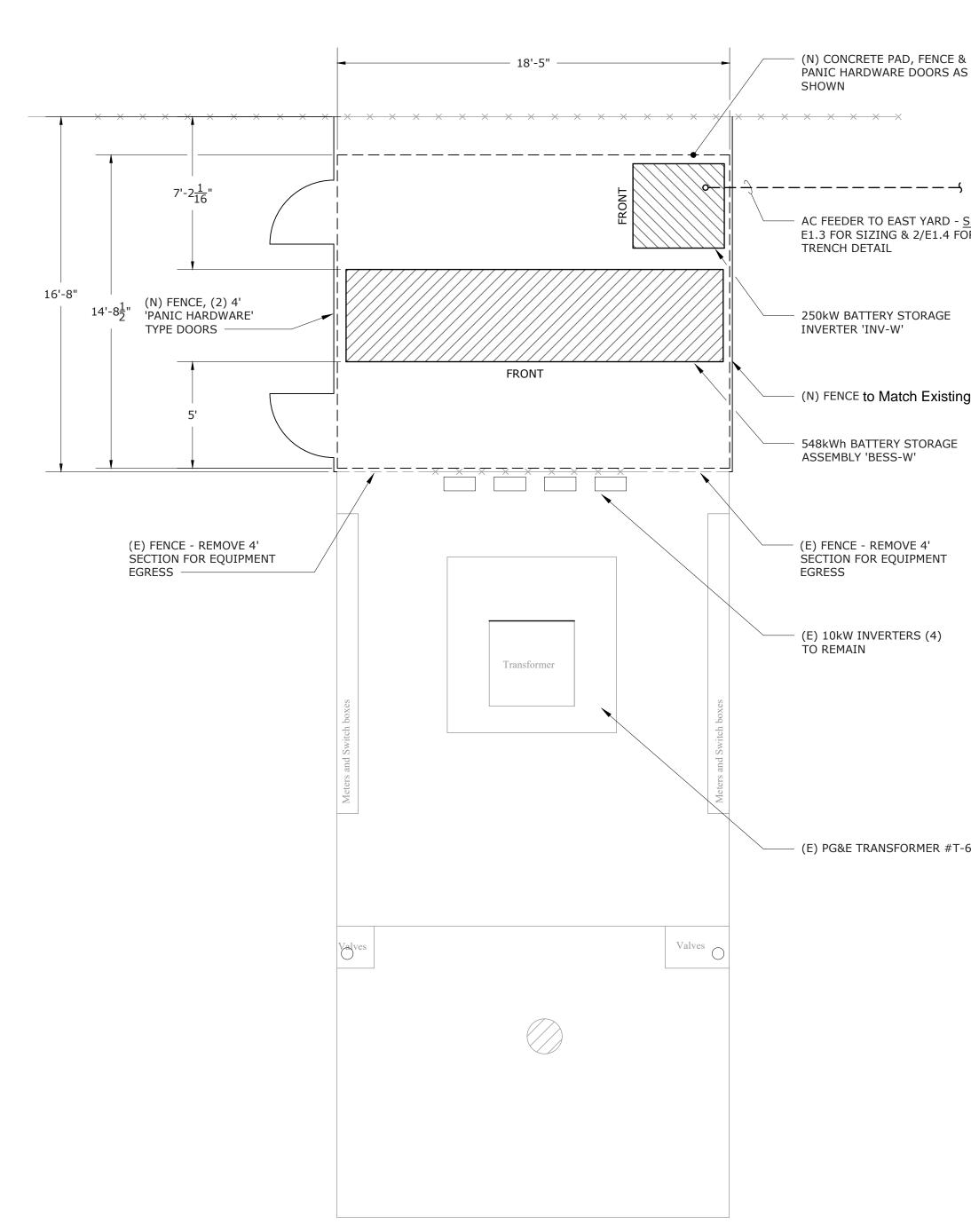
- ALL CONSTRUCTION SHALL COMPLY WITH SAN FRANCISCO 2016 BUILDING CODES.
- 2. ALL EXTERIOR EQUIPMENT / BOXES / COMBINERS SHALL BE NEMA 3R RATED FOR OUTDOOR USE.
- ALL BARE METAL RACEWAYS SHALL BE EMT, OR RGS WHERE REQUIRED BY LOCAL AUTHORITY OR UTILITY; U.O.N.
- ALL CONDUCTORS TO BE SIZED PER CEC/SF ELEC CODE T310.15(B)(16) WITH APPROPRIATE AMBIENT TEMPERATURE CORRECTION FACTORS PER CEC T310.15(B)(3)(c) AND/OR NEC 310.15(B)(2). CONDUCTORS SHALL ALSO BE DERATED PER CEC TABLE 310.15(B)(3)(a) FOR MORE THAN (3) CURRENT CARRYING CONDUCTORS IN A COMMON RACEWAY.
- ALL CONDUIT CONNECTORS TO OUTLET OR JUNCTION BOXES SHALL HAVE INSULATED THROATS (MANUFACTURED AS AN INTEGRAL PART OF THE CONNECTOR). AFTER-MARKET INSERTABLE THROATS ARE NOT ACCEPTABLE.
- COORDINATE ALL UTILITY SYSTEM RELATED ITEMS WITH UTILITY CO..
- ALL SYSTEM COMPONENTS AND EQUIPMENT / WIRING TO COMPLY WITH CEC/SF ELEC CODE ARTICLE 706 AND OTHER APPLICABLE CODES, REGULATIONS AND LOCAL ORDINANCES.
- ALL AC FEEDERS SIZED TO CEC/SF ELEC CODE T310.15(B)(16), 75 DEGREE COLUMN WHEN USED WITH 75 DEGREE TERMINATIONS AND EQUIPMENT. CONDUCTOR SIZES TO BE BASED ON FULL EQUIPMENT NAMEPLATE LOADS.
- 9. ALL CONDUIT FILL (AC AND DC) TO BE 40% MAXIMUM.
- 10. PROVIDE AN EQUIPMENT GROUNDING CONDUCTOR IN EACH CONDUIT (BOTH AC AND DC), SIZED PER CEC 250 AND 690.
- 11. ALL AC AND DC WIRING IN CONDUIT TO BE RHW-2, THWN-2, OR XHHW-2 (90 DEGREE) WET RATED FOR USE WITH 90 DEGREE LISTED TERMINALS ON PV EQUIPMENT.
- 12. ALL UNDERGROUND RACEWAYS TO BE SCHEDULE 40 PVC, UNLESS OTHERWISE NOTED.
- 14. PROVIDE DIRECTORIES PER CEC/SF ELEC CODE 706.20 (B) AND (C).
- 13. ALL IN-GROUND PULL BOXES TO BE FLUSH STYLE WITH CONCRETE LIDS.

O'MAHONY & ELECTRICAL ENGINEERING and LI	
4340 REDWOOD HWY, SAN RAFAEL, CALIFO (415) 492-0420/FAX (41	SUITE 245 RNIA 94903 5) 479-9662
www.ommconsultir	
PROFESSION COLEN	and a
U No.14738	
STATE OF CALIFOR	3
Project:	
VALENCIA GA	RDENS
BATTERY CHA SYSTEM	
390 Valencia	St,
San Francisco, CA	
Valancia Card	000
Valencia Gard Housing Ltd	
All drawings and written material constitute the original and unpub	lished work of
the engineer and the same may r used or disclosed without the writ the engineer.	
ISSUANCE - PLAN CHECK	01/16/20
DATE DRAWN: SCALE	01/16/20 AS NOTED
DRAWN BY	JK 217137
Sheet Title:	21/13/
Site Cover	Plan
Sheet Number:	
E 1.0	









PARTIAL PLAN - WEST ELECTRICAL YARD SCALE: 1/4" = 1'-0"

(N) CONCRETE PAD, FENCE & PANIC HARDWARE DOORS AS

- AC FEEDER TO EAST YARD - <u>SEE</u> E1.3 FOR SIZING & 2/E1.4 FOR

— 250kW BATTERY STORAGE

— (N) FENCE to Match Existing Wood Fence

- 548kWh BATTERY STORAGE

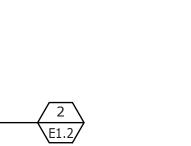
— (E) FENCE - REMOVE 4'

(E) 10kW INVERTERS (4)

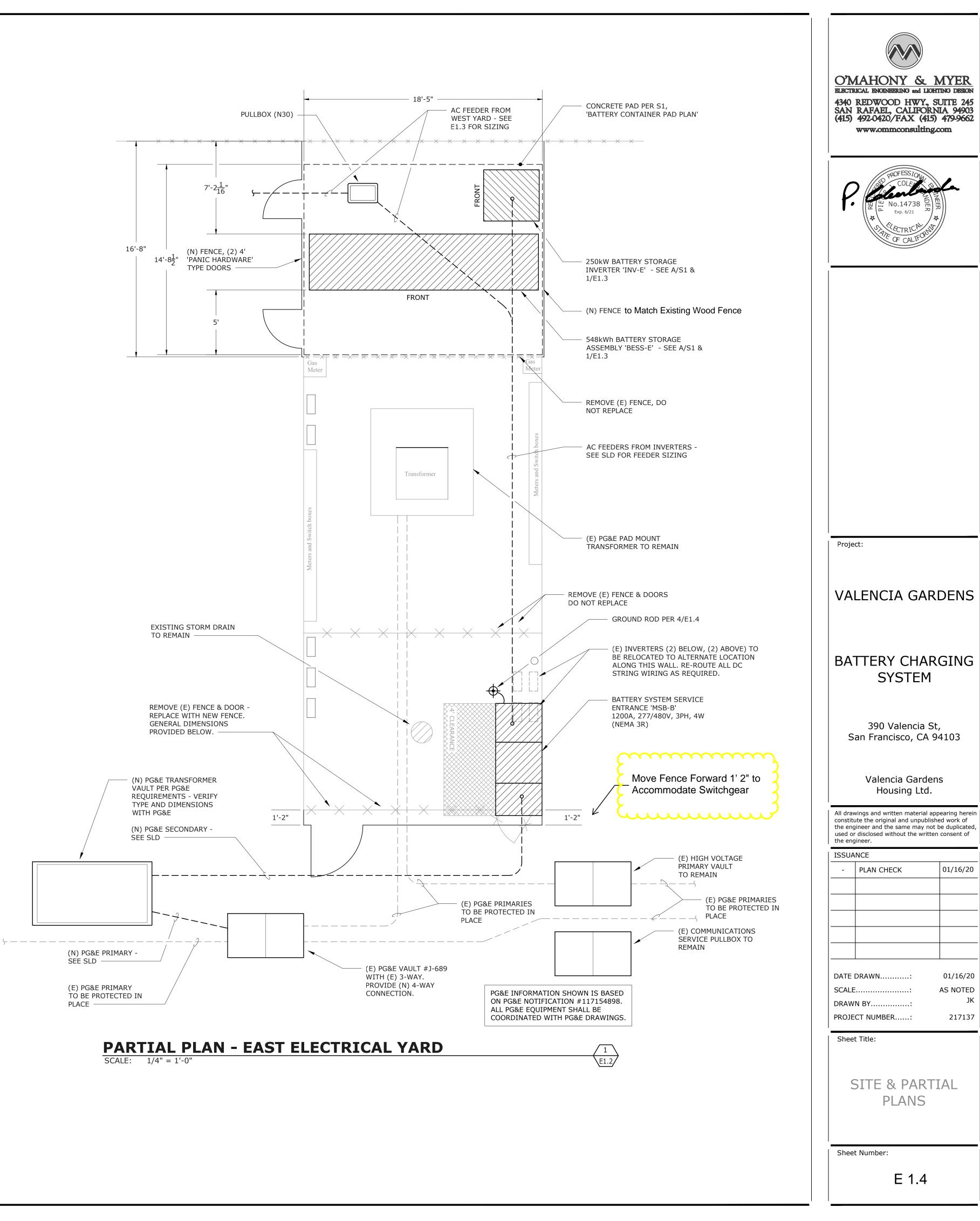
(E) PG&E TRANSFORMER #T-6767







PLACE -

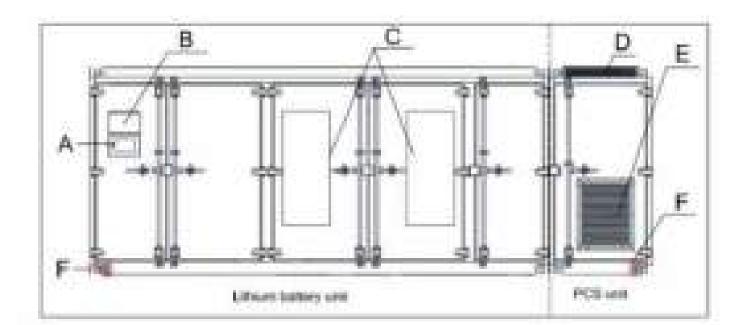


PARTIAL PLAN - EAST ELECTRICAL YARD

SAFETY SWITCHES/ALARMS - 250KW/548KWH ESS



VALENCIA GARDENS

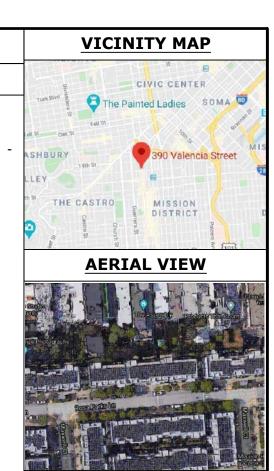


Station appearance		
No.	Description	
A	Emergency stop protection box	
8	Audible and visual alarm	
c	Air inlet and outlet of the air-conditioner inside the lithium bettery cabinet	
D	Device air outlet (PGS)	
E	Air inlet blind window (PCS)	
F	System grounding connector	





Manual Disconnect (BCP)



Emergency 210p (BCP)

(PCS)



Disconnect(PCI)

CUSTOMER INFORMATION

ADDRESS:390 VALENCIA ST, SAN FRANCISCO, CA 94103

37.767572, -122.423335 APN: 3546002

AHJ:CA-CITY OF SAN FRANSICO

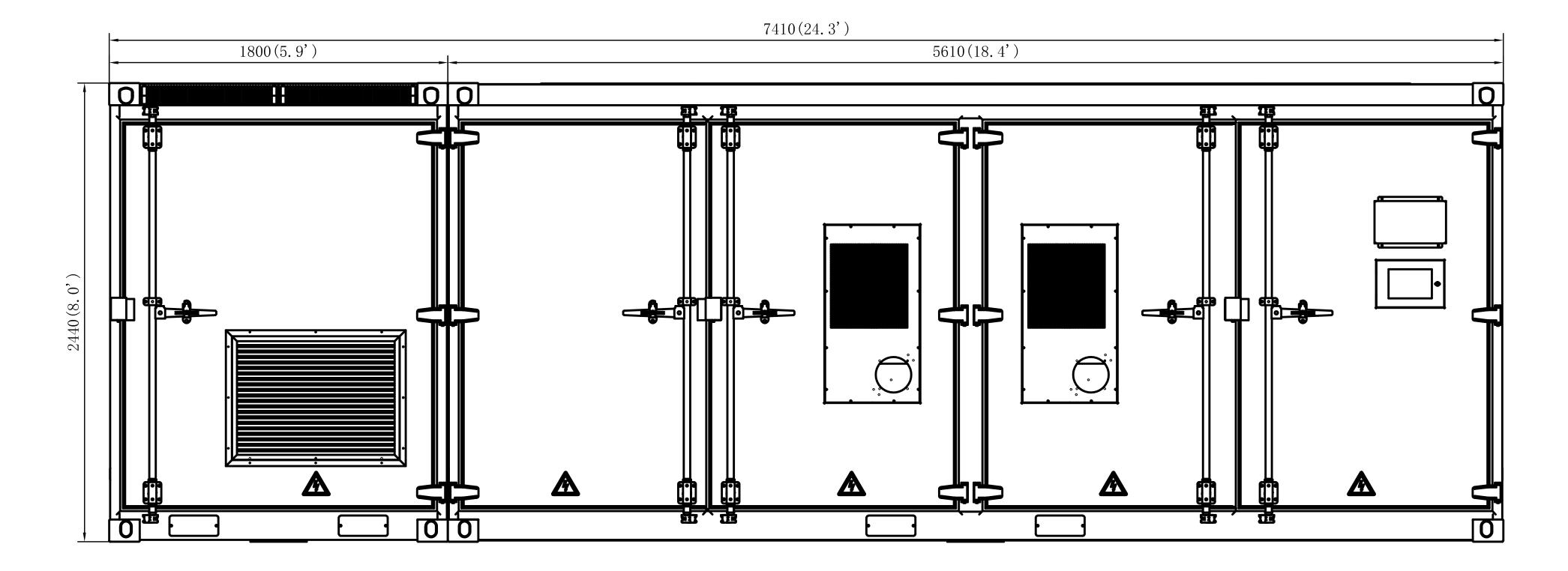
UTILITY:PG&E

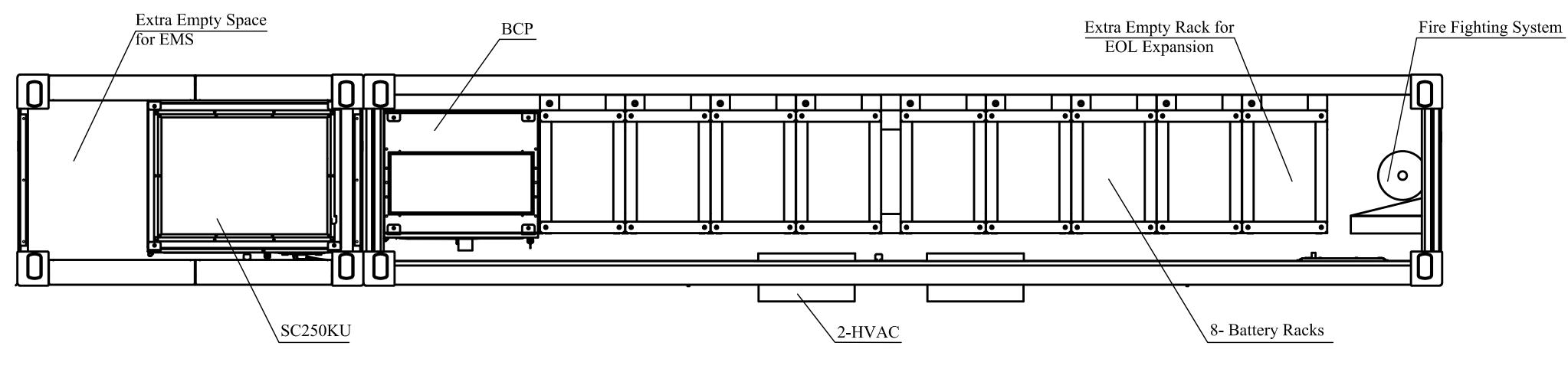
PRN NUMBER:ABC-008978

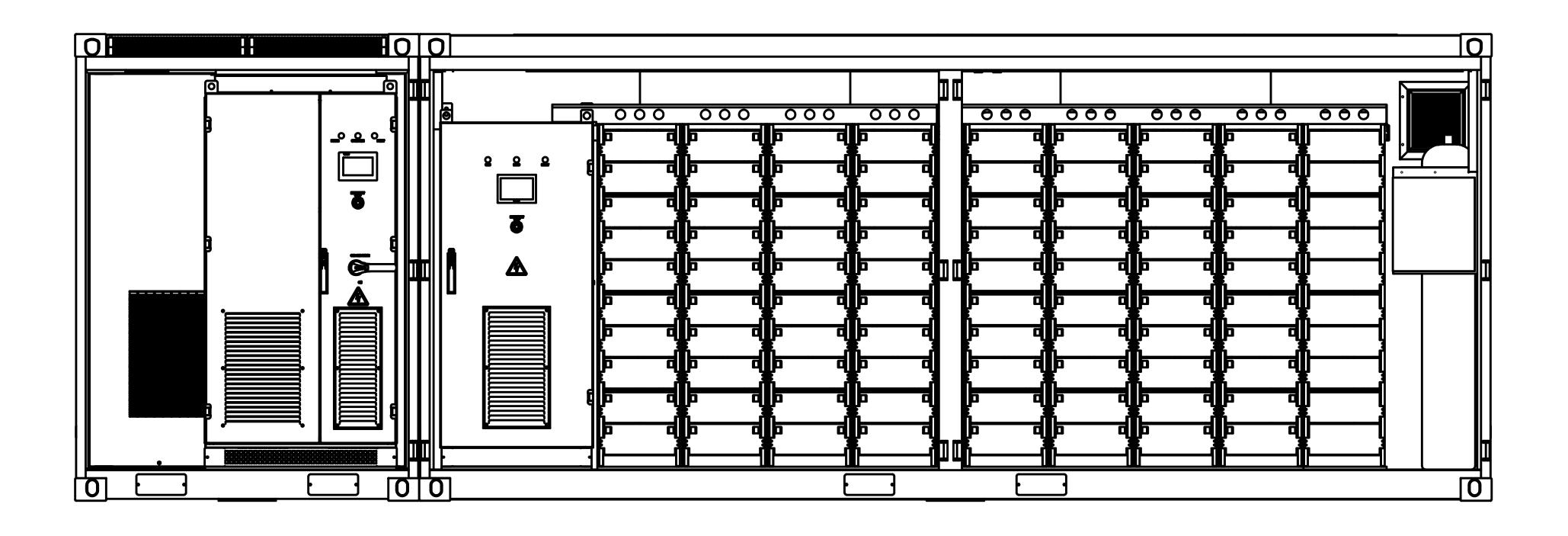
ENERGY STORAGE GEAR, SAFETY SWITCHES, AND ALARMS

DESIGNER /CHECKED BY: AE/HK SCALE:AS NOTED REV:A

DATE:4/21/2020 E 2.0







VALENCIA GARDENS

1182(3.9') 1100(3.6') 10 ۲ Ŀ Ο



CUSTOMER INFORMATION NAME: VALENCIA GARDENS ADDRESS:390 VALENCIA ST, SAN FRANCISCO, CA 94103 37.767572, -122.423335

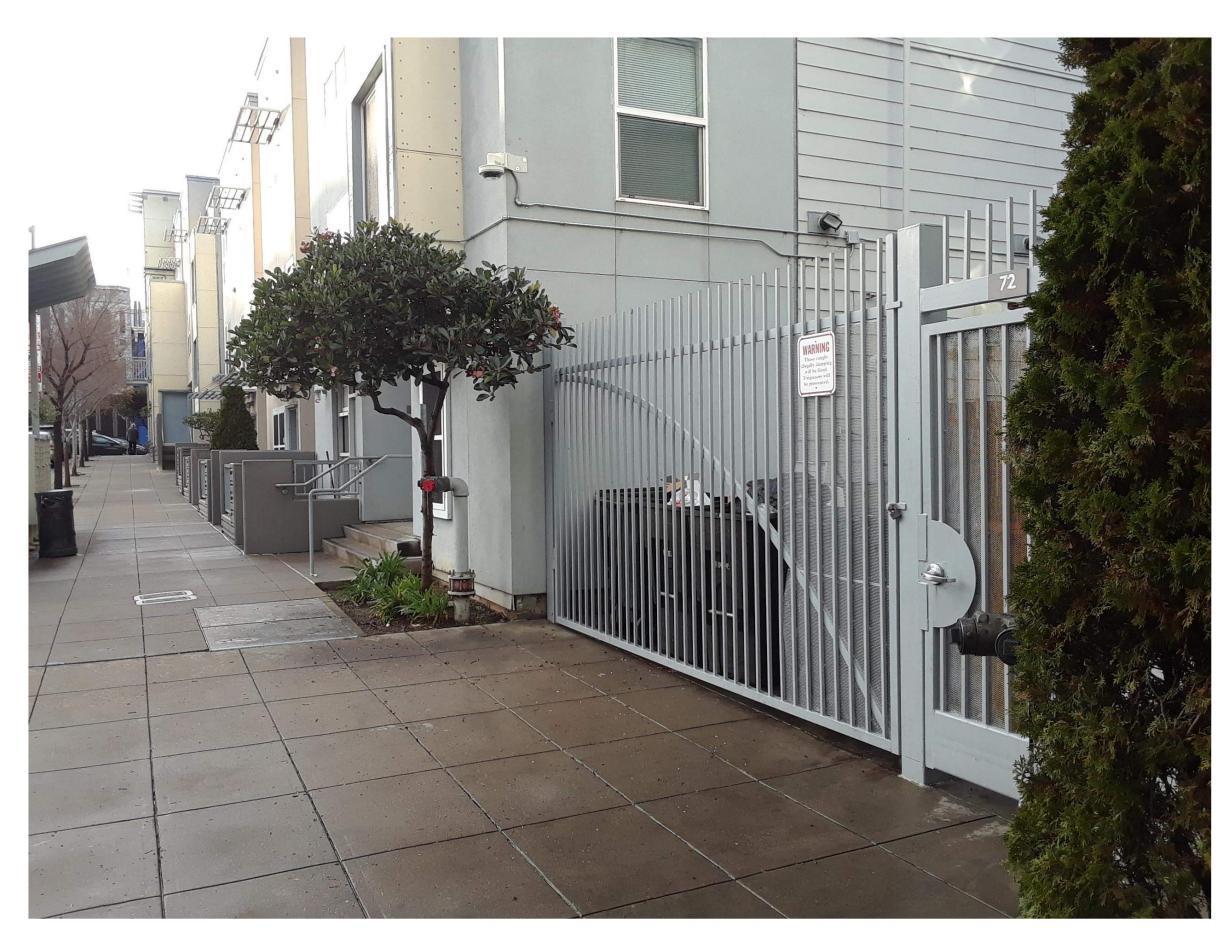
APN: 3546002 AHJ:CA-CITY OF SAN FRANSICO

UTILITY:PG&E PRN NUMBER: ABC-008978

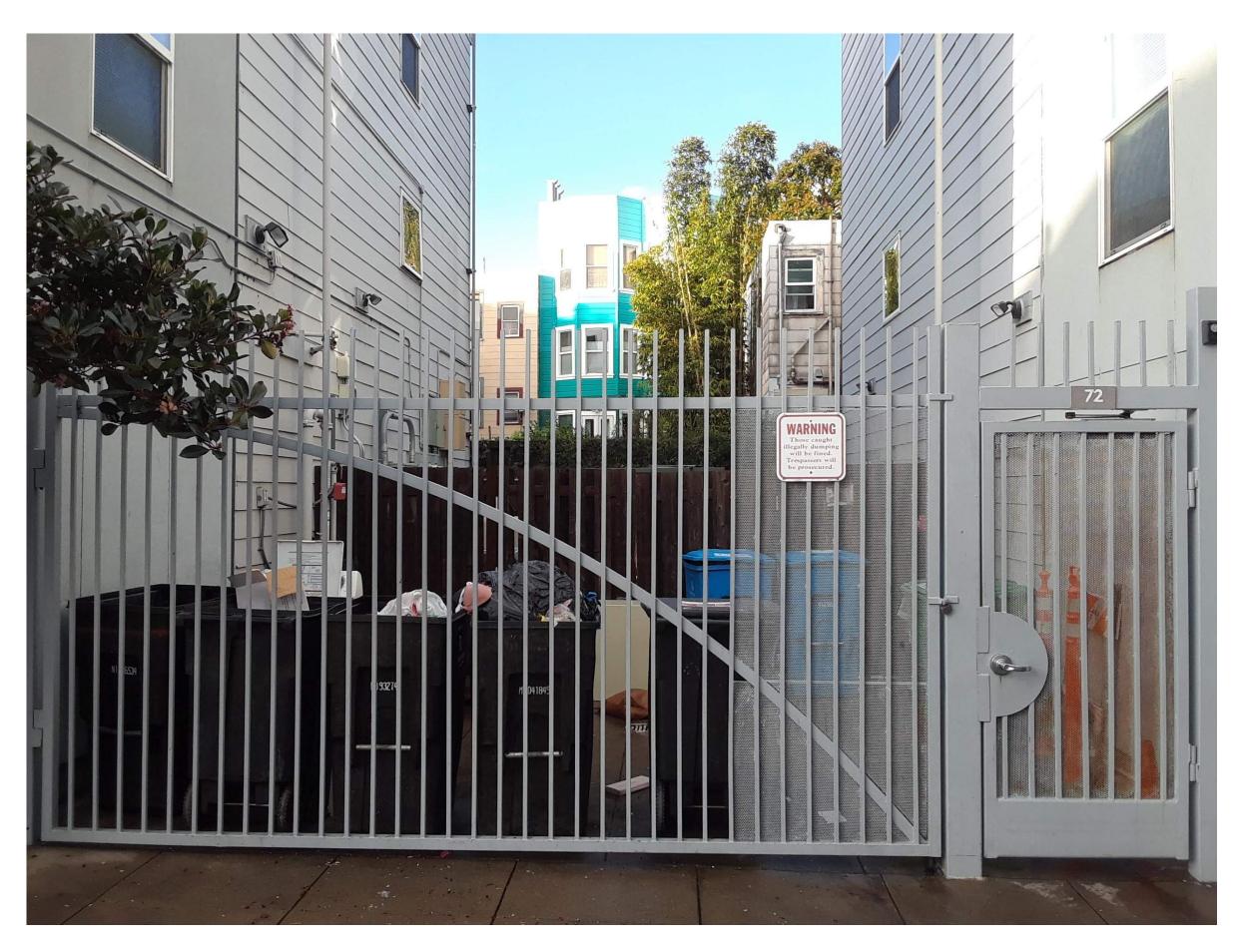
> ENERGY STORAGE SYSTEM LAYOUT AND DIMENSIONS

DESIGNER /CHECKED BY: AE/HK

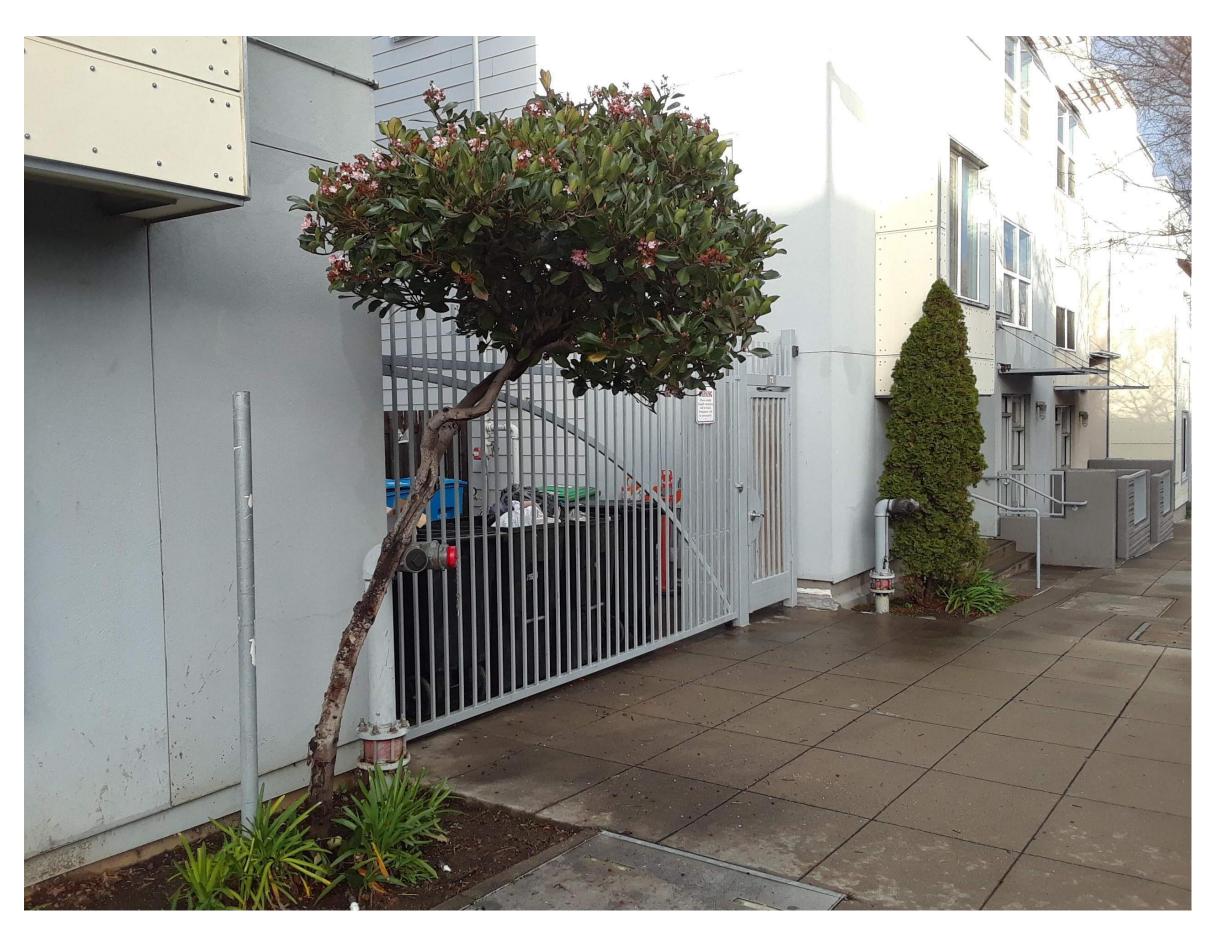
REV:A SCALE: AS NOTED E 2.1 DATE:4/21/2020



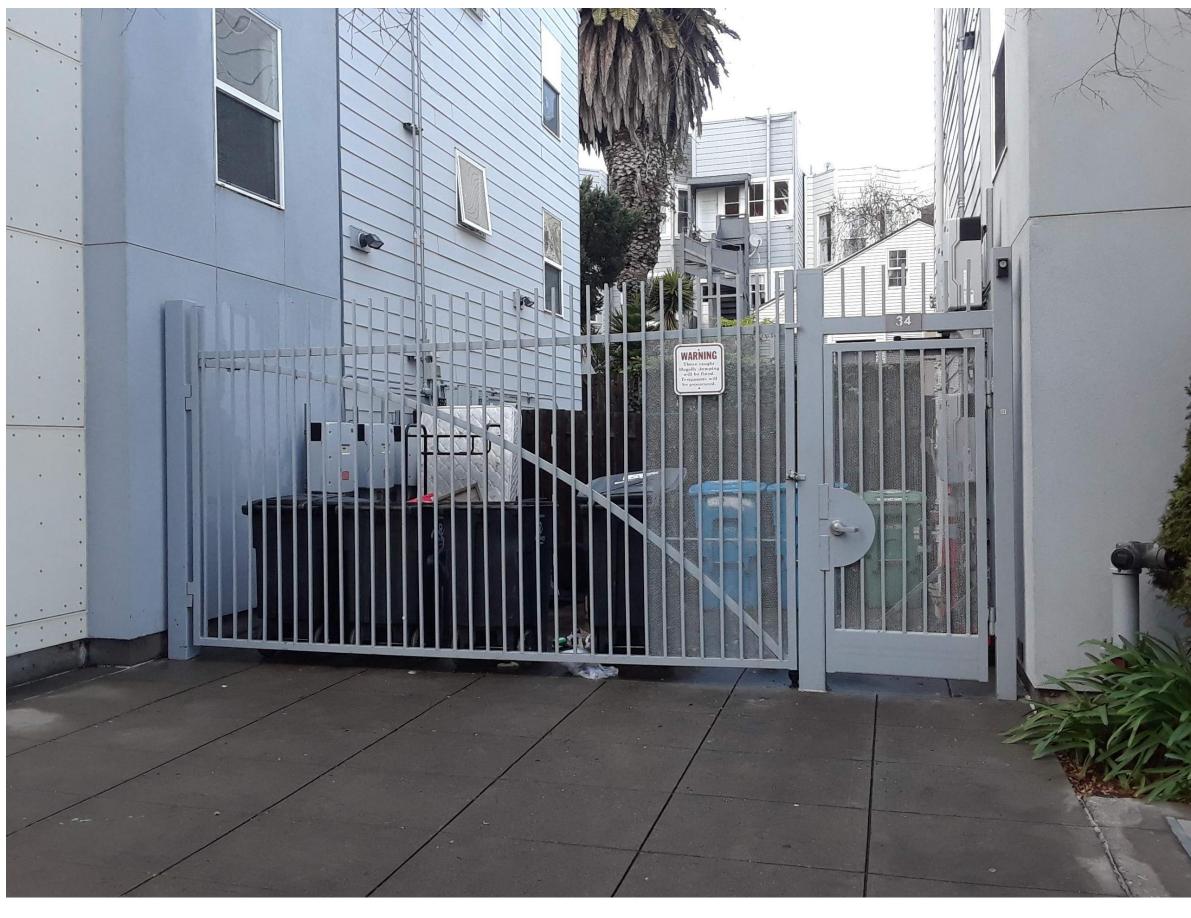
LOOKING TOWARDS GUERRERO STREET



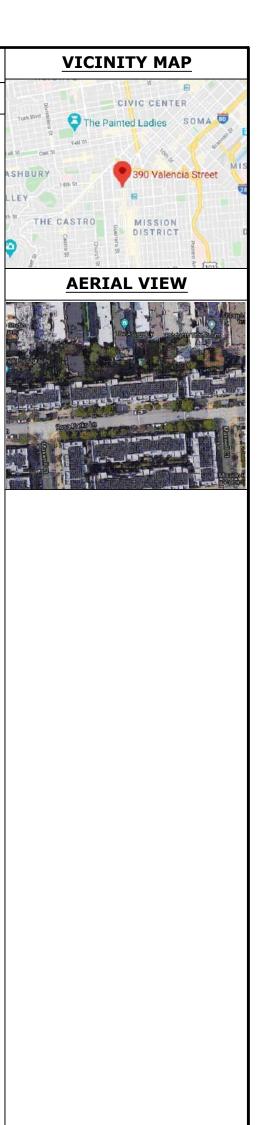
WESTERN ENERGY STORAGE LOCATION



LOOKING TOWARD VALENCIA STREET



EASTERN ENERGY STORAGE LOCATION



CUST	OMER I	NFORMATIO
NAME:\	/ALENCIA GA	RDENS
	SS:390 VALE SCO, CA 941	ENCIA ST, SAN 103
37.767 APN: 35	572, -122.42 546002	3335
AHJ:CA-	CITY OF SAM	N FRANSICO
UTILITY	:PG&E	
PRN NU	MBER:ABC-0	08978
_	SITE P	HOTOS

SCALE: AS NOTED

DATE:4/21/2020

REV:A

E 2.2



Photo of Back Wall Fence with Solar Inverters (Western Direction)



Photo of Over Back Wall Fence Showing Side Fence Restricting Egress (Western Direction)



Photo of More Solar Inverters and Gas Utility Location

VALENCIA GARDENS



Photo of PG&E Transformer, Electrical Panel, and Solar Inverters

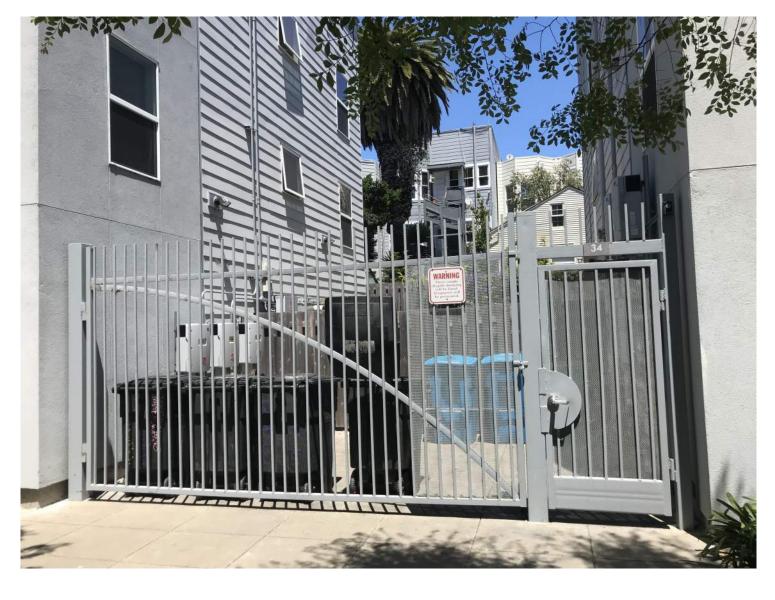


Photo of Enclosure Showing Use as Garbage & Recycling Collection Area

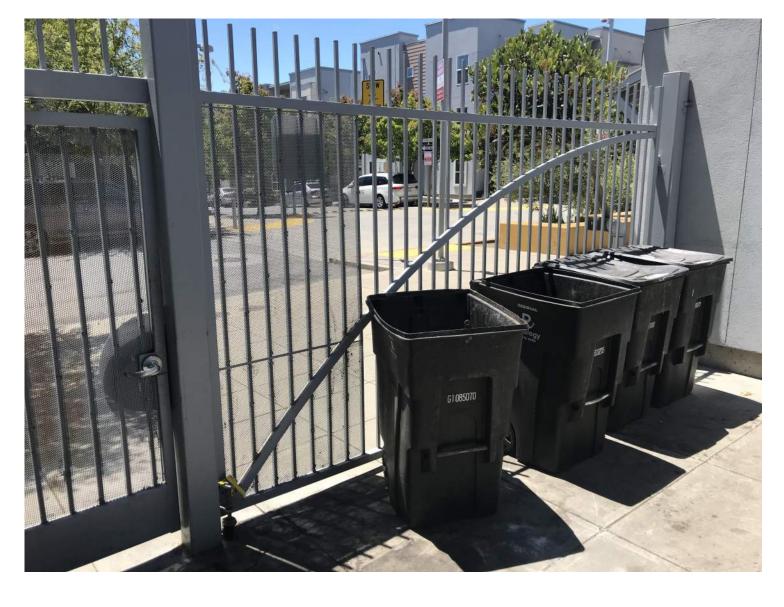


Photo within Enclosure Showing Use as Garbage & Recycling Collection Area



(Eastern Direction)





Photo of Back Wall Fence with Solar Inverters

Photo of Over Back Wall Fence Showing Side Fence Restricting Egress (Eastern Direction)

(N) Fence where Noted on E1.4 Site & Partial Plans Drawing Shall Match Existing Wood Fence



CUSTOMER II	NFORMATIO
NAME:VALENCIA GAR	RDENS
ADDRESS:390 VALEN FRANCISCO, CA 9410	
37.767572, -122.423 APN: 3546002	335
AHJ:CA-CITY OF SAN	FRANSICO
UTILITY:PG&E	
PRN NUMBER:ABC-00	8978
SITE PI	HOTOS
DESIGNER /CHECKED BY: AE/HK	

REV:A

E 2.3

SCALE:AS NOTED

DATE:4/21/2020

Exhibit C - Environmental Determination





CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)
390 VALENCIA ST		3546002
Case No.		Permit No.
2020-003825PRJ		
Addition/ Alteration	Demolition (requires HRE for Category B Building)	New Construction

Project description for Planning Department approval.

Conditional Use Authorization request for installation of (2) Energy Storage, NEM 3R, UL Certified enclosures. The primary purpose of the Energy Storage is to store existing PV capacity and to discharge when needed for grid stabilization. This will allow increased PV capacity on this circuit. Installation of on-site renewable energy systems, such as solar photo-voltaic, solar hot water, co-generation, wind turbine generators or other renewable features.

STEP 1: EXEMPTION CLASS

-	The project has been determined to be categorically 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. FOR ENVIRONMENTAL PLANNING USE ONLY 		
	Class		

STEP 2: CEQA IMPACTS 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., backup diesel generators, heavy industry, diesel trucks, etc.)? (<i>refer to EP_ArcMap > CEQA Catex Determination Layers > Air Pollution Exposure Zone</i>)
	 Hazardous Materials: If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? Note that a categorical exemption shall not be issued for a project located on the Cortese List if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).
	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?
	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, archeo review is required (<i>refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area</i>)
	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? (<i>refer to EP_ArcMap > CEQA Catex Determination Layers > Topography</i>). If yes, Environmental Planning must issue the exemption.
	Slope = or > 25%: Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (<i>refer to EP_ArcMap > CEQA Catex Determination Layers > Topography</i>) If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.
	Seismic: Landslide Zone: Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones) If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.
	Seismic: Liquefaction Zone: Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones) If box is checked, a geotechnical report will likely be required and Environmental Planning must issue the exemption.
Comments and Planner Signature (optional): Alex Westhoff	

STEP 3: PROPERTY STATUS - HISTORIC RESOURCE

TO BE COMPLETED BY PROJECT PLANN	ΞR

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 <i>Guidelines for Adding Garages and Curb Cuts</i> , 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.	
	 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 <i>Zoning</i> 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: CEQA IMPACTS - ADVANCED HISTORICAL REVIEW

TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.		
	1. Project involves a known historical resource (CEQA Category A) as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.	
	2. Interior alterations to publicly accessible spaces.	
	3. Window replacement of original/historic windows that are not "in-kind" but are consistent with existing historic character.	
	4. Façade/storefront alterations that do not remove, alter, or obscure character-defining features.	
	5. Raising the building in a manner that does not remove, alter, or obscure character-defining features.	
	6. Restoration based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.	
	7. Addition(s), including mechanical equipment that are minimally visible from a public right-of-way and meet the Secretary of the Interior's Standards for Rehabilitation.	

	8. Other work consistent with the Secretary of the <i>Properties</i> (specify or add comments):	Interior Standards for the Treatment of Historic		
	9. Other work that would not materially impair a his	toric district (specify or add comments):		
	(Requires approval by Senior Preservation Planner,	Preservation Coordinator)		
	10. Reclassification of property status . (Requires Planner/Preservation	approval by Senior Preservation		
	Reclassify to Category A	Reclassify to Category C		
	a. Per HRER or PTR dated	(attach HRER or PTR)		
	b. Other <i>(specify)</i> :			
Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST sign below.				
	Project can proceed with categorical exemption r Preservation Planner and can proceed with categor			
Comments (<i>optional</i>):				
Preser	vation Planner Signature:			
STEP 6: CATEGORICAL EXEMPTION DETERMINATION TO BE COMPLETED BY PROJECT PLANNER				

Project Approval Action:	Signature:	
Planning Commission Hearing	Alex Westhoff	
	09/15/2020	
Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter		

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 environmental review pursuant to CEQA.

MODIFIED PROJECT DESCRIPTION

Modified Project Description:

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

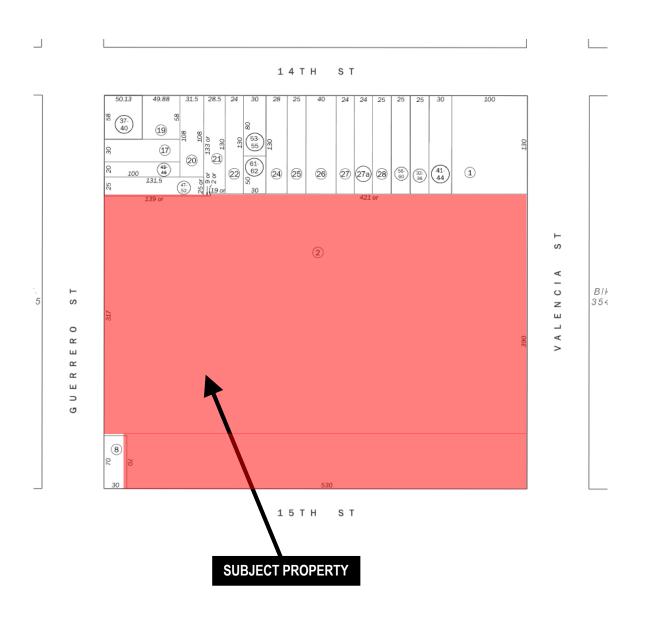
Compared to the approved project, would the modified project:			
	Result in expansion of the building envelope, as defined in the Planning Code;		
	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;		
	Result in demolition as defined under Planning Code 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.					
approva website with Ch	f this box is checked, the proposed modifications are categorically 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 vebsite and office and mailed to the applicant, City approving entities, and anyone requesting written notice. In accordance vith Chapter 31, Sec 31.08j of the San Francisco Administrative Code, an appeal of this determination can be filed within 10 lays of posting of this determination.					
Planner Name:		Date:				

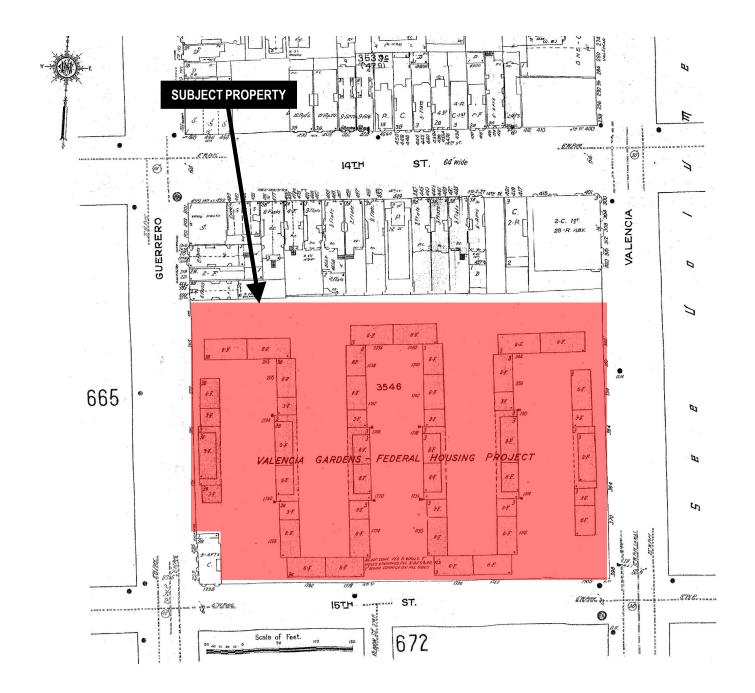
Exhibit D - Maps and Context Photos

Parcel Map



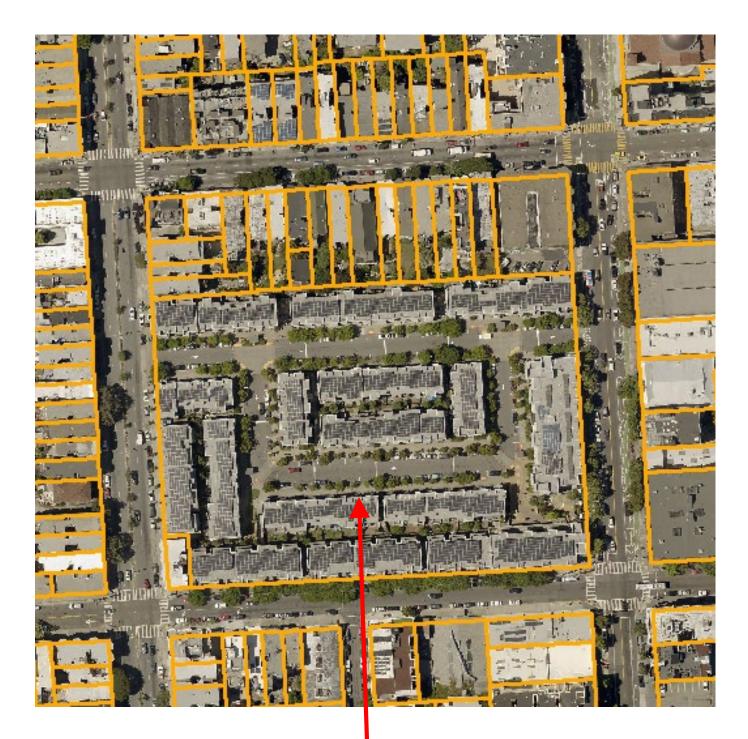
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Sanborn Map*



 $\mathbf{\mathbf{b}}$

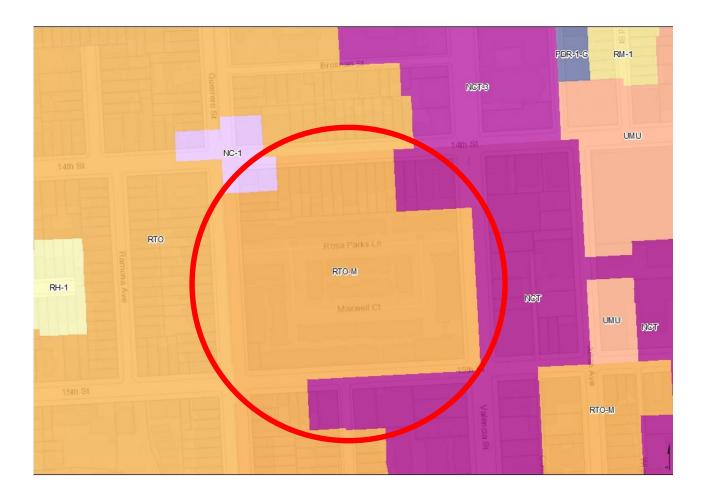
Aerial Photo



SUBJECT PROPERTY

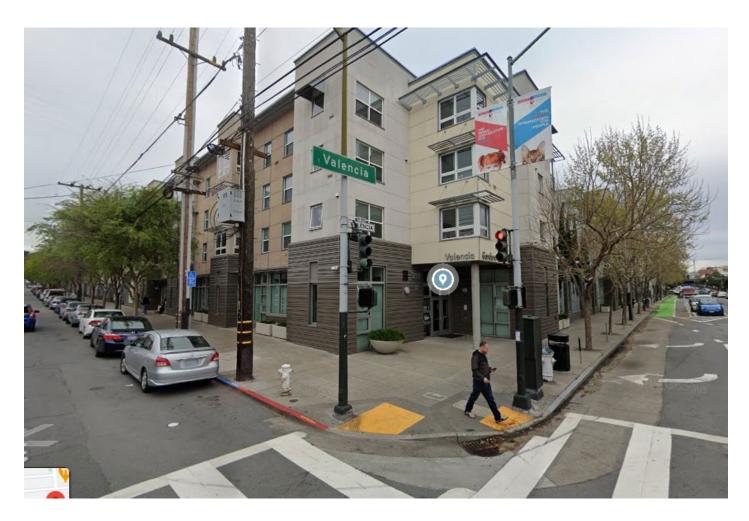


Zoning Map





Site Photo (SE corner)



Source: Google Earth

Site Photo (Valencia St at Rosa Parks Lane)



Source: Google Earth

SAN FRANCISCO PLANNING DEPARTMENT

Site Photo (Guerrero St at Rosa Parks Lane)



Source: Google Earth

SAN FRANCISCO PLANNING DEPARTMENT

Exhibit E - Project Sponsor Brief



5 October 2020

San Francisco Planning Department 1650 Mission Street, Suite 400 San Francisco, CA 94103

Subject: Valencia Gardens Energy Storage (VGES) Conditional Use Authorization Request

Dear Planning Commission,

The Clean Coalition is leading the Valencia Gardens Energy Storage (VGES) Project funded through the California Energy Commission, grant award EPC-16-073. The VGES project is at a critical juncture as permits need to be issued in order to meet the construction schedule including PG&E's required commissioning scheduled for late Q1 2021/early Q2 2021.

The specifics of the project include installing two energy storage systems in separate locations (approximately 206 feet apart). The actual sq. ft. footprint is approximately 85 sq.ft. for each energy storage system which is below the 100 sq. ft equipment limit (noted in the Public Utility District (PUD) document). We are respectfully requesting the San Francisco Planning Commission to grant a CUA to install both units as designed. Additionally, Mission Housing Development Corporation (Site Host), is 100% supportive of the VGES project and the approval of the CUA.

This groundbreaking project, located at a public housing complex in the heart of San Francisco's Mission District, will not only benefit a low-income area of the city, it will showcase how front-of-meter (FOM) energy storage can be effectively deployed in dense, developed urban environments.

The Valencia Gardens Apartments (VGA) has 218 family flats and 42 senior apartments among 16 buildings on a five-acre site. The purpose of this project is to utilize distributed energy storage as part of an optimized local energy system that both increases support for distributed solar PV generation while improving overall grid operations and economics.

Key features:

- The first FOM merchant energy storage project in California.
- Sited at the VGA, a 300,000-square-foot low-income and senior housing facility with 260 units in San Francisco's Mission District.
- Will pair 1096 kWh innovative energy storage with the existing 580 kW of existing FOM solar at the VGA one of the largest solar installations in San Francisco on a circuit with a peak load of 570 kW.
- Designed to enhance the interconnection hosting capacity of the existing feeder by at least 25% and ensure that far more solar can be sited on that feeder.
- Staged to provide indefinite renewables-driven backup power to critical loads at the VGA and potentially other facilities on the feeder.



By demonstrating how targeted deployment of energy storage can increase the grid's ability to handle greater amounts of distributed solar, VGES will set the stage for increased deployment of clean local energy in California and beyond.

This project is critical to the development of alternative energy storage technologies to support California's Energy Storage Mandate under AB 2514 and AB 2868. The project contributes to alternative technologies, thus part of the eventual 1.8 GW of energy storage the IOUs will procure by 2020.

We respectfully request the San Francisco Planning Commission approve the CUA as the VGES project will result in a successful FOM deployment and technology/knowledge transfer project that can be shared and proliferated in California and beyond.

Should you have any further questions, please feel free to contact me directly at (949) 501-0967.

Thank you for your consideration and support for this very important project.

Regards,

Dr. Frank Wasko

Dr. Frank Wasko Managing Director Clean Coalition Mobile: (949) 501-0967 Email: frank@clean-coalition.org