

Mandatory Green Building Requirements in the City of Oakland

March 9, 2009

Project Name:	Citywide
Proposal:	Discussion and comment on the historic component in the proposed green building requirements for private development as a referral from Special Projects Committee public hearing.
Applicant:	City Planning Commission
Environmental Determination	Under Review
Status	Recommendations contained within staff report
For further information:	Contact case planner Heather Klein at (510) 238-3659 or hklein@oaklandnet.com.

SUMMARY

The demolition, construction, and use of buildings have an impact on the environment, the economy, and our health. Green buildings reduce energy use, conserve water indoors and out, limit solid waste during construction, and in urban areas reduce the amount of vehicle miles traveled by residents. All of these benefits have been found to reduce emissions of carbon dioxide, a green house gas (GHG) and contributor to global warming. In addition, green buildings are constructed from sustainable products that preserve natural resources through the use of local materials and recycled products. Green buildings benefit occupants through the use of healthy building materials, including zero to low Volatile Organic Compound (VOC) and formaldehyde free products. In addition, green buildings encourage the growth of additional businesses and jobs in order to support the needs of the green building industry.

The purpose of this report is to discuss the proposed mandatory green building threshold requirements for historic properties as a referral from the Special Projects Committee. Staff requests that the Landmarks Preservation Advisory Board (LPAB) review the recommendations and provide staff clear direction, with emphasis on the issues discussed in the report, as well as any other issues the Board or the community may have.

BACKGROUND

Green Building Rating Programs

Staff recommended that the City of Oakland use the Leadership in Energy and Environmental Design (LEED) and/or Build It Green's GreenPoint Rated programs as the basis for the Ordinance. Staff presented recommendations to the Planning Commission on October 1, 2008 and the Community and Economic Development Committee of City Council on October 18, 2008 and both of these bodies agreed with staff's recommendation. Below is a brief summary of these programs.

Leadership in Energy and Environmental Design (LEED)

In 2000, the US Green Building Council (USGBC) developed the LEED green building rating system for the design, construction, and operation of high performance buildings. This system is the internationally accepted benchmark for green buildings and is typically applied to commercial, civic, and high-rise residential buildings. The USGBC has developed specific rating programs for the following building types:

Mandatory Green Building Requirements in the City of Oakland

- New Commercial Construction and Major Renovation Projects
 - Commercial Interiors
 - Existing Buildings Operations and Maintenance
 - Core and Shell Development
 - Schools
 - Retail
- * Currently LEED for Homes and Neighborhood Development are in the pilot phase.

The LEED system is a point based program with third party verification. Projects must pre-qualify for LEED by meeting several pre-requisites. The project team then designs features into the project to qualify for points, which are tallied to achieve a rating. In the LEED for New Construction Version 2.2 rating system, the LEED Certified rating is achieved with 26-32 points, LEED Silver is 33-38 points, LEED Gold is 39-51 points, and LEED Platinum is 52-69 points. At each rating level, a certain amount of points must be achieved in each environmental category (e.g., energy and atmosphere, water efficiency, materials and resources). At the end of the project, the applicant team must submit documents to verify compliance with the points to the USGBC. The USGBC reviews the documentation and certifies the project as a LEED project at the earned level of performance.

GreenPoint Rated

In 2005, Build it Green was created as a result of the merger of the Green Resource Center and Bay Area Build it Green. Build it Green has developed the GreenPoint Rated rating system which has become the standard for evaluating the green performance of new single-family and multi-family projects, although it can also apply to neighborhood and high-rise residential development. This system is solely based in California and includes practices that exceed California codes. GreenPoint Rated is also a point based program with third party certification. There are fewer pre-requisites and no certification tiers in GreenPoint Rated. The minimum point level is currently 50 and the possible number of points goes up from there. It is difficult to calculate the maximum number of achievable points since points that are awarded for one feature might disqualify the project from achieving points for another feature. A minimum amount of points must be achieved in each category such as Community, Energy, Indoor Air Quality, Resources, and Water. The project team must retain a GreenPoint Rater to verify compliance with the GreenPoint Rated program. Without documentation, a certified rater and submittal of the documentation, a project is not considered to be a GreenPoint Rated project.

Special Projects Committee Hearing

Staff presented the proposed green building thresholds to the Special Projects Committee on February 19, 2009. Both the Committee and the public had comments on the proposal. One of the major concerns was the thresholds related to historic properties. Several persons commented that mandatory certification for historic properties was too onerous, that historic properties could not meet the mandatory requirements, that the thresholds should not include historic buildings and that the ordinance should be narrow in focus, and that the green building ordinance should not be used for the preservation of historic structures because the City already has existing policies that accomplish this objective. Several other persons commented that they supported the historic thresholds and that they were appropriate. Another person thought that the commercial thresholds for additions and alterations should be more stringent. The Committee asked the LPAB to review the proposal and provide recommendations to staff and the full Planning Commission.

Mandatory Green Building Requirements in the City of Oakland

SUMMARY OF THE PROPOSAL

The proposed thresholds are currently split into six main parts:

1. Residential
2. Non-Residential
3. Historic
4. Neighborhoods
5. Projects with Notice of Funding Availability (NOFA)
6. Mixed Use

The Residential, Non-Residential and Historic sections contain recommendations for new construction, as well as additions, alterations, and remodeling. Each section contains mandatory requirements per year of implementation. In developing certain thresholds, staff looked at existing permit thresholds for consistency in reviewing the project and determining the process in order to ease staff implementation.

Below are the thresholds specifically for historic buildings (other thresholds are located in the staff report, Attachment A). After an internal discussion with appropriate staff the thresholds were clarified. These are indicated in cross-out and underline text.

Historic Buildings			
New Construction projects resulting in demolition of a Potentially Designated Historic Property rated C or higher on the Local Register- LEED: New Construction (NC) or other appropriate LEED rating system for commercial construction OR Single-Family Green Point Rated (GPR) Checklist or Multi-Family Green Point Rated (GPR) Checklist for residential construction.			
<i>Year</i>	Year 1	Year 2	Ongoing
Mandatory Requirements	Mandatory submittal of LEED NC or <u>GreenPoint Rated</u> checklist	<p>LEED Silver and the required points shall be increased by 50% of the total required</p> <p><u>LEED Gold for new construction of commercial buildings with certification OR 100 Green Point Rated points for residential projects with certification</u></p>	<p>LEED Silver-Gold AND the required points shall be increased by 50% of the total required AND deconstruction of the historic structure with Certification required for commercial construction</p> <p><u>OR 100 GreenPoint Rated points AND deconstruction of the historic structure with Certification required for residential projects</u></p>
Commercial Additions/Alterations/Remodeling of a Potentially Designated Historic Structure rated C or higher on the Local Register, over 25,000 sf + - LEED: Core and Shell (CI) or Commercial Interior (CI) Checklist			
<i>Year</i>	Year 1	Year 2	Ongoing
Mandatory Requirements	Voluntary requirements; Mandatory submittal of LEED CS or CI checklist	13 point minimum; No certification; Mandatory submittal of LEED checklist	LEED Certified; Certification required

Mandatory Green Building Requirements in the City of Oakland

Single-Family Residential Additions/Alterations/Remodels of a Potentially Designated Historic Structure rated C or higher on the Local Register that exceed 1,000 sq. ft. of total floor area: Build it Green Existing Home Green Points Checklist			
Year	Year 1	Year 2	Ongoing
Mandatory Requirements	Voluntary requirements; Mandatory submittal of Existing Home GPR checklist	13 point minimum for Elements; Mandatory submittal of Existing Home GPR checklist	Elements certification (25 point minimum)

* Note: This is the same proposed threshold as existing homes that are not historic and are undergoing an addition, alteration or remodel that exceed 1,000 sq. ft.

Multi-Family Residential Additions/Alterations/Remodels: Build it Green Existing Multi-Family Green Points Checklist			
Year	Year 1	Year 2	Ongoing
Mandatory Requirements	Not Available	Participation in the Existing Multi-Family Green Point pilot program	<u>Existing Multi-Family Green Point Checklist</u> <u>Threshold to be determined and equivalent to other thresholds in the ordinance</u>

Proposed Project with Demolition

Currently, projects that demolish a Potentially Designated Historic Property (PDHP) rated C or higher on the Local Register must meet more stringent entitlement requirements than a proposal on vacant land. This proposal for additional green building requirements for similar projects than involve demolition of a PDHP parallels this policy direction.

The first year there are no penalties for demolition but the applicant must submit the appropriate LEED or GreenPoint Rated checklist. In the second year, staff had originally proposed that new construction projects that demolish a historic structure automatically start out with a 50% negative point value and must achieve LEED Silver (without the negative start it would be a LEED Gold project). The purpose of the negative points was to emphasize that not incorporating the historic structure or an adaptive reuse into the project is the wrong approach and not very creative. Comments received at the Special Projects Committee indicated that a negative or “brown points” was confusing.

Staff eliminated this language to just require a LEED Gold building with certification for new construction commercial projects. Staff heard concerns at the Special Projects hearing that LEED certification was being required for new residential construction with demolition of a historic structure. Staff clarified the threshold requirement that the Build It Green rating program would be used for these projects. However, because the project entails the demolition of the historic building, the point requirement would be increased from 50 to 100 points. This requirement would ensure that the City of Oakland is getting a new building that is comparable in terms of design quality, construction, and importance to that which was demolished.

In the third year the same requirements as year 2 still apply. However, the applicant must also utilize deconstruction techniques. Deconstruction is the systematic dismantling of a building to preserve the useful value of its component materials. Unlike demolition, which landfills most of the potentially

Mandatory Green Building Requirements in the City of Oakland

reusable building materials, deconstruction disassembles buildings in a manner that conserves and sorts materials that can be used again or remanufactured into higher-value goods.

Commercial Additions/Alterations/Remodeling of a Potentially Designated Historic Structure rated C or higher on the Local Register over 25,000 sq. ft.

In the first year the applicant must submit the appropriate LEED checklist and the requirements are voluntary. In the second year half of the minimum points to achieve a LEED Certified level and certification would not be required. The applicant would still need to submit the checklist. In the third year and ongoing, the applicant would need to meet the minimum amount of points to achieve a LEED Certified level and certification by the USGBC would be required.

Residential Additions/Alterations/Remodeling of a Potentially Designated Historic Structure

To further clarify the thresholds, staff has added two thresholds related to residential projects. The first threshold is for applicants proposing an addition, alteration or remodel to a Single-Family Potentially Designated Historic Structure rated C or higher on the Local Register that exceed 1000 sq. ft. of total floor area. Staff is proposing that Build It Green's Existing Home: Elements Label is used. The Elements certification is for smaller remodels such as a kitchen or bathroom remodel or additions. In the first year, the applicant must submit the checklist. In the second year, the applicant must meet half of the minimum required (13 points) with no certification. In the third year, the project must meet the minimum required points for certification. An example of this type of project would a 1906 Victorian proposing a change to the floor plans, a kitchen remodel, and the addition of a bathroom at the back of the house.

The second threshold applies to applicant's proposing an addition, alteration or remodel of a Multi-Family Potentially Designated Historic Structure rated C or higher on the Local Register. An example of this type of project is the Altenheim, the Packard Lofts, or the Cathedral Building project. In each of these projects a gut remodel was proposed which included new building systems for residential units. Stopwaste.Org and Build It Green are working on Existing Multi-Family Guidelines and they expect to begin development of the pilot program this spring. It is anticipated that the pilot will be ready within two years. This timeframe coincides with staff's phasing scheduled for implementation of the green building requirements and staff is proposing that these buildings be evaluated under the Existing Multi-Family program. Since this is still in the pilot program the requirements will be revisited and determined at a later date, but will be equivalent to the other residential thresholds.

KEY ISSUES

Staff had many discussions on how to address historic buildings within mandatory green building requirements. Staff requests that the LPAB discuss the thresholds and provide recommendations to staff to be forwarded to the full Planning Commission. Staff has identified the following key questions for discussion.

- 1. Staff is proposing green building thresholds for new construction. Should there be stricter green building thresholds for projects that demolish a Potentially Designated Historic Property rated C or higher on the Local Register and then build new?**
- 2. Should the threshold for commercial additions and remodels be lower or higher than 25,000 sq. ft.? Should the thresholds for residential additions or remodels be lower or higher than 1,000 sq. ft.?**

Mandatory Green Building Requirements in the City of Oakland

3. Should third party certification per a known rating program be required?

Staff Justification for Thresholds related to Historic Properties

General Plan Policies

Historic Preservation Element

The Historic Preservation Element (HPE) cites many objectives, policies, goals and existing program deficiencies, all of which lead toward incorporating historic buildings into the Mandatory Green Building Requirements so that historic buildings can remain competitive in the market and to prevent obsolescence and 'demolition by neglect'.

Existing Program Deficiencies

- Inadequate procedures to protect and enhance significant older properties as part of ongoing City activities, including regulatory activities.
- Need for more effective code enforcement and other methods to stabilize, adequately secure, and rehabilitate significant older properties which are severely deteriorated, vacant, or abandoned.

Goals, Objectives and Policies

- Stabilizing neighborhoods, enhancing property values, conserving housing stock, increasing public and private economic and financial benefits, and promoting tourist trade and interest through preservation and quality maintenance of significant older properties.
- To develop regulations for specially designated significant older properties which enhances the economic feasibility for preservation.
- To establish administrative procedures and criteria to promote preservation of significant older properties as a routine part of regulatory activities.
- The City will use a combination of incentives and regulations to encourage preservation of significant older properties and areas which have been designated as Landmarks, Preservation Districts or Heritage Properties.
- The City will always consider including a historic preservation component and the impact on historic properties will be evaluated.

Economic Development Opportunities

- Older buildings frequently provide retail and commercial space for the small businesses which are vital to downtown and neighborhood economies. Investment in these buildings leads to an enhanced tax base, greater public revenues, and permanent job creation. The special character and atmosphere of well-managed old buildings sometimes helps attract customers and can act as a catalyst for investment in neighboring properties.

Land Use and Transportation Element

- Existing vacant or underutilized buildings should be reused. Repair and rehabilitation, particularly of historic or architecturally significant structures, should be strongly encouraged.

Greening historic buildings as they are rehabilitated insures implementation of the above policies.

Greenest Approach

Mandatory Green Building Requirements in the City of Oakland

In developing the demolition threshold, staff researched other jurisdiction's proposed green building ordinances and their approach to historic buildings. Several jurisdictions including the Cities of Livermore, Brisbane, and San Jose did not address historic structures. Other jurisdictions including the Cities of Los Angeles, Hayward, Pleasanton and Palo Alto specifically exempted historic structures. San Francisco's Green Building Ordinance does address both building retention and the green features not only of a historic buildings but any existing building. San Francisco's Ordinance requires an increase in LEED or Green Point rated points for demolition of any existing building, with an escalating number of points required, based on the proposed density compared to the existing density. Less additional points are required for an increase in density. Demolition of a historic resource requires the highest increase in additional points regardless of density. San Francisco's Ordinance, which does not require certification of a building, also reduces the required LEED or GreenPoint Rated points for retention of Significant Architectural Features. For example, retention of windows would permit a reduction in LEED points (See Attachment B for excerpts from the Ordinance).

Staff believes that historic buildings do need to be addressed within the proposed ordinance. While other jurisdictions exempted historic structures noting that retention and rehabilitation of a building was the "greenest" approach, these jurisdictions did not address the least sustainable approach- demolition of the building. According to the Historic Element of the General Plan, dated 1993, about half of the City's buildings date from before 1946. In addition, the City of Oakland includes a high number of significant older properties due to its history and development patterns. Furthermore, the Historic Element also states that since World War II Oakland has lost a significant number of historic properties due to demolition, insensitive alteration or neglect. This trend is still continuing. However, by accommodating an existing building into the proposed project, construction waste is diverted, green house gas emissions are lessened, and material resources are saved.

In developing thresholds for additions, alterations, or rehabilitations to existing buildings, staff noted the general thinking is that existing buildings are not as energy efficient as new construction. In fact, historic buildings tended to be built with the local climate in mind including shutters and high ceilings where climates are warm and thick walls and smaller windows where the climate is cold. Most of these buildings also were constructed with local materials; natural ventilation and attic fans; shading with vegetation; passive heating; skylights and clerestory windows, cisterns for water collecting; eaves; front porches that promoted community and natural surveillance; as well as other climate-related features. These older features mirror the point requirements in the both the Build It Green and LEED rating systems. Wood windows are also thought to be generally to be inefficient. However, only 10 to 12% of heat loss is through windows. More heat is lost through openings around the windows, the roof, and un-insulated walls. Again, the general thinking is that replacement of wood windows that have lasted 50-100 years is a better investment than repairing the windows. These newer windows cannot be repaired so they must be eventually be replaced. This is not as sustainable as repairing the existing windows.

Furthermore, when analyzing the energy efficiency of a building most people only refer to the operating energy or how much energy it takes to heat, cool, and light a building. Another reason to retain existing buildings is the embodied energy in a building. Embodied energy is amount of energy bound up in the existing building or how much energy it took to build the building. According to a recent article¹, a new energy efficient office building doesn't start saving energy for about 40 years. If the new building replaces (demolishes) an older building it takes 65 years to recoup the energy lost because the demolition

and disposal consumes a significant amount of energy. For residential, it takes 13 years to recoup the lost energy but given the sizes of homes the time period would increase to 28 years.

¹ Amid our recent green-building boom, why neglecting the old in favor of the new just might cost us dearly, Wayne Curtis, Preservation January/February 2009

Mandatory Green Building Requirements in the City of Oakland

Based on this information, staff believed that it was important to address and discourage the demolition of historic buildings as well as to address additions, alterations, and remodels of existing historic buildings.

Economic

The retention and remodel of existing buildings makes sense not only from a waste and energy standpoint but from an economic one. Staff had several discussions with the Economic Development Division about whether to include a threshold related to historic buildings and the conclusion was to develop a threshold for these buildings. Recently commercial developers have begun to self-impose LEED certification for new Class A buildings (typically the highest quality office space locally available, including modern construction with state-of-the-art functionality and architectural design, infrastructure, life safety and mechanical systems.) Potential tenants see the benefit in the LEED certification because that ensures a healthier working environment, locations close to transit, with natural lighting and other sustainable features. Examples of this include Center 21, the Shorenstein project at the T-12 site, the recently approved SKS development at 1100 Broadway, and the proposed 1938 Broadway office tower still under planning review.

Class B buildings typically attract a different type of tenant than Class A buildings. These tenants appreciate the typically lower lease cost of older buildings, yet they also prefer the architectural distinction, design and decoration that often accompany Class B and C buildings. These buildings tend to attract newer companies, entrepreneurial individuals that are focused on cutting edge industries such as digital media, software, renewable energy and other “green” industries. These companies demand the energy efficiencies and healthy environments that are the products of LEED certification and will choose a “green” Class B building over one that does not include this benefit.

Oakland’s Class B commercial stock currently experiences a 12% vacancy rate in the Downtown vs. 9% vacancy in Class A space, and 21% vacancy in Class B office space in the Airport area. Given the acceleration of “greening” businesses in recent months, it is not overstating the case to project that Oakland’s Class B stock could become increasingly vacant as tenants push for occupancy in “green” buildings. The fact is that the Class B and C buildings will not be able to compete for tenants unless the City does not address existing alterations or remodels of these Class B and C buildings. If left unoccupied, these buildings undoubtedly fall into disrepair – and in some cases, further disrepair, and potentially a means to justify demolition.

Plaza 360 (Pacific Real Estate Partners, Inc.) is a recent example of an existing, 1960’s era (not historic) building that is anticipated to achieve LEED certification. According to the developer and the Economic Division, the building is generating a lot of interest from potential tenants and the developer has actually leased over 30,000 sq. ft. to four energy tenants in the last few months: BP Alternative Energy, Orion Energy, CTG Energetics and Alliance for Climate Education. Oakland would not have been able to attract these tenants without available “green building” office space.

In addition to the local market, there is also a regional office market. Plaza 360 has also retained Pandora.com, an internationally-known tenant with over 120 employees that was looking to relocate out of Oakland in 2008. However, this company decided to stay because of the owner’s significant, green improvements made to the building. Staff developed a threshold for existing historic buildings because it

makes economic sense and also places the City of Oakland in a better position to take advantage of the need for sustainable Class B and C office space.

Current Green Building and Historic Preservation in Oakland

Mandatory Green Building Requirements in the City of Oakland

The City requires a minimum of LEED Silver certification for all City owned projects. Currently, the first historic building, a City of Oakland Landmark, to comply with this requirement is the adaptive reuse of the Municipal Boathouse at Lake Merritt. However, in addition to this City requirement for City-owned buildings, other non-City owned historic buildings have elected to become LEED certified, as well as older existing buildings. Building owners have found that ‘greening’ an existing building works as an effective marketing tool. One of the below projects, Plaza 360, a LEED Existing Building, has increased its occupancy from a building that was half empty to 70% occupancy. And, the owner has stated that occupants are attracted to the building specifically because of its green features. Again, this illustrates the strategic importance of upgrading historic buildings to remain competitive and to avoid obsolescence and ‘demolition by neglect’. Listed below are several Oakland historic/existing building projects.

Historic Green Projects - Oakland

1520 Lakeside Drive (1905-15), Municipal Boathouse, is a City-owned, City of Oakland Landmark. The Municipal Boathouse has been adaptively rehabilitated for use as a restaurant. The City required the rehabilitation to attain LEED Silver certification.

426 17th Street (1924), Earthjustice National Headquarters, is located in the Wakefield medical building, built in 1924 and listed as a Designated Historic Property, rated B. The Headquarters attained LEED Commercial Interior certification.

1629 Telegraph Avenue (1924), the Uptown Arts Building, is a Beaux Arts derivative loft building, a PDHP and contributor to an Area of Primary Importance, rated C1+. RPR Architects attained a LEED Commercial Interior certification.

365 45th Street, Studio One Arts Center (1894), is City-owned and a City of Oakland Landmark and also listed on the National Register of Historic Places. Its recent adaptive reuse, prior to the City’s Silver LEED requirement, incorporated selective Green Measures.

247 Marlow Drive, Sheffield Village Recreation Center, is a single family residence rehabilitated for reuse as a Recreation Center. It is a Contributor to the designated S-20 Historic Preservation Combining District. Its adaptive reuse incorporated selective Green Measures.

Existing Green Buildings - Oakland

1537 Webster Street, Alameda County Waste Management Authority, StopWaste.Org, is not a historic property. However it was originally a Land Title Company/Graphic Arts building, remodeled in 1959, incorporating a 1921 store and office building. It is LEED Platinum certified.

360 22nd Street (1957), Plaza 360, is not a historic property. However it was recently purchased and rehabbed under LEED Existing Building. This included new cleaning and maintenance procedures along with recommissioning of the buildings mechanical systems for efficiency, essentially ongoing operations and maintenance.

As a recent Business Times article points out, brand-new green buildings tend to make the headlines; however, buildings don’t have to be new to be green. Green rehabilitations run the gamut from eco-friendly build-outs of individual suites and floors to whole-building upgrades of lighting and mechanical systems.

Green Economy/Jobs

Mandatory Green Building Requirements in the City of Oakland

There continues to be increasing attention to green jobs and the green economy, partly driven by expanding activity in the green building sector. Staff also took this into consideration when developing the thresholds for historic structures. Staff believes that there will be a niche market for persons versed in “greening” historic buildings and the special considerations that these buildings require in order to maintain their standing on the local, state and National Registers. On the one hand, the deconstruction requirement for historic buildings will create a disincentive to demolish such structures, since deconstruction is typically more expensive. On the other hand, older buildings often contain large vertical grain timbers and other high quality architectural features that can be quite valuable in the open market.

In addition, the deconstruction of existing buildings and the recycling of these materials encourage the creation of jobs and businesses. An example is the recent deconstruction of Bldg. 802 at the old Oakland Army Base, a 230,000+ sq. ft. warehouse constructed in 1941 of Douglas fir. Unlike typical “smash and trash” demolition, careful deconstruction of the building resulted in a 98% recovery of wood for reuse and recycling; overall, 73% of the building materials were diverted from the landfill. In addition, deconstruction sustained a crew of between 10 and 25 people over the four months it took to dismantle the building. Notably, there are six more warehouses at the Army Base that will be deconstructed in the coming years.

CONCLUSION

As shown in the discussion above, the thresholds related to historic buildings take into account the specific development conditions in Oakland. The thresholds address Oakland’s goals and policies, the existing historic building stock, waste generated from the demolition of these buildings, our regional position related to office space, and the potential for job and business growth. While other jurisdictions might not have many historic buildings, not addressed historic structures or exempted them, staff concluded that to not address these buildings if any way would be to ignore a large portion of Oakland’s building stock. New construction requirements alone cannot achieve Oakland and the state’s sustainable goals.

Staff asks that the LPAB review the staff report; receive public comments; and provide recommendations to staff on the historic thresholds for forwarding to the full Planning Commission.

Respectfully submitted:

ERIC ANGSTADT
Interim Deputy Director,
Community and Economic Development Agency

Prepared by:

Heather Klein
Planner III, Major Development Projects

Joann Pavlinec
Historic Preservation

Attachments:

A: Special Projects Staff Report, February 19, 2009

