



SAN FRANCISCO PLANNING DEPARTMENT

July 5, 2017

Brad Mooney
Bayside Development LLC
150 Executive Park Boulevard, Suite 4000
San Francisco, CA 94134

Re: Schlage Lock Phase I Application Approval

Dear Mr. Mooney,

The Planning Department (Planning) has received the revised Development Phase I Application for the Schlage Lock Development Project (The Project), Case Number 2006.1308EMTZ submitted by Project Sponsor Bayside Development LLC (Project Sponsor) and dated April 28, 2017. On December 13, 2016, the Project Sponsor submitted a letter to Planning clarifying its initial Phase I Application submittal dated February 10, 2016, to state that it intended to seek approval of interim alignments for Sunnydale Avenue and Street F that differ from the Permanent Public Improvements (Permanent Improvements) shown in the approved tentative map, the Visitacion Valley Schlage Lock Open Space and Streetscape Master Plan (OSSMP), and the Schlage Lock Infrastructure Plan as adopted in the Schlage Lock Development Agreement (DA).

As per section 3.4.4 of the DA, the Planning Department and City Agencies have conferred in good faith with each other and with the Project Sponsor to review the Phase Application and determine whether it fulfills the Proportionality, Priority and Proximity Requirement in the DA. With the following conditions, this letter approves the revised Development Phase I Application.

Sunnydale Avenue Alignment and Bayshore Caltrain Station Multi-Modal Access

As an alternative to constructing across the jurisdictional boundary between the City and County of San Francisco and the City of Brisbane to the south during Phase I of the Project, the Project Sponsor is requesting through this Phase Application permission to reconfigure Street F and realign and shorten Sunnydale Avenue on an interim basis from that which is shown in the approved tentative map, OSSMP, and DA. At the same time, the Project Sponsor, the Planning Department, and other City Agencies recognize the importance of a robust multi-modal connection between the Bayshore Caltrain Station and Muni routes on Bayshore Boulevard through the Schlage Lock development site. The following findings inform the conditions below:

- a. The OSSMP street network was designed to appropriately reflect the need and desire for a seamless and interconnected street grid with the future Baylands development site in Brisbane. The approved street grid, shown in the tentative map, OSSMP, and DA (see Exhibits A, B, and C, respectively), envisions a future Sunnydale Avenue extending straight across the county line and is considered the best alignment for providing access to the Bayshore Caltrain Station. This alignment was agreed upon by the City and the Project Sponsor despite its cross-border alignment;

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- b. The Project Sponsor proposes to reconfigure Street F and realign and shorten Sunnydale Avenue as Interim Public Improvements (Interim Improvements) as defined in DA Section 3.5.1, which is subject to approval by Public Works. These Interim Improvements, as shown in Exhibits D and E, differ from what is shown in the approved tentative map, OSSMP, and DA. A realigned and shortened Sunnydale Avenue, proposed as an Interim Improvement, necessarily results in a less desirable route to the Bayshore Caltrain Station for all transportation modes;
- c. As per the inter-agency Bayshore Multi-Modal Facility Study, dated March 2017, Sunnydale Avenue is the logical and most convenient multi-modal connection between the T-Third line, MTA bus lines along Bayshore Blvd, the planned Geneva-Harney BRT, and the Bayshore Caltrain Station, as well as for private vehicles, shuttles, pedestrians, and cyclists accessing the above transit facilities;
- d. As an element of the Bayshore Multi-Modal Facility Study, the Planning Department, in consultation with Public Works, San Francisco Municipal Transportation Agency (SFMTA), City and County Association of Governments of San Mateo, City of Brisbane, and Caltrain, has developed four concept-level alternative designs for a Multi-Modal Transportation Facility (Multi-Modal Facility) adjacent to the Caltrain station on Sunnydale Avenue that includes pedestrian and bicycle access, vehicular loading areas, and shuttle loading areas for at least four commuter shuttles. See Exhibit F for the concept designs, which were shared with the public and the Project Sponsor in November 2016.
- e. While the DA requires only that the Project Sponsor build interim pedestrian access to the Caltrain Station via Street F before receiving a temporary certificate of occupancy (TCO) for the first building constructed on Parcel 3 (which is part of the Phase 1 Application), the City has concluded that multi-modal access from Sunnydale Avenue to the Station is desirable at the earliest possible stage in the Project to avoid undesirable traffic congestion and vehicular/pedestrian conflicts within the Schlage development site and to provide better intermodal connections between the Caltrain station and shuttles, private vehicles, T-Third Muni Metro, and multiple Muni bus lines on Bayshore Blvd (including future Geneva-Harney Bus Rapid Transit).
- f. As a Permanent Improvement, the Interim Improvement proposal as well as Bayshore Multi-Modal Facility Study Concepts 1, 2, and 3 (see Exhibit F) would require Planning Commission approval under DA Section 3.3.1 and Planning Code Section 249.45 as Material Changes from the Basic Approvals as compared to the original Sunnydale Avenue alignment approved in the OSSMP. Multi-Modal Facility Concept 4, which generally conforms to the Basic Approvals, would not require approval by the Planning Commission as a permanent Public Improvement.
- g. As an Interim Improvement, pursuant to DA Section 3.5.1, the Interim Improvement proposed as well as Bayshore Multi-Modal Facility Study Concepts 1, 2, and 3 may be approved by Public Works with the consent of affected City Departments (including the Planning Department), at their respective sole discretion, and subject to any terms or conditions that the City deems appropriate, including sufficient security to guarantee completion and removal of the Interim Condition as well as security for the Permanent Public Improvement.

- h. The Project Sponsor proposes to complete construction of all underground utilities, grading, and construction of road base, curb, and gutter for all Project streets during Phase 1.
- i. The City is committed to ensuring that the future street grid and connectivity to the Brisbane Baylands site occurs as planned in the OSSMP and that the street alignments and infrastructure currently being designed for the Schlage site are compatible with this goal. The Project Sponsor must demonstrate its ability to deliver the project as proposed and recognize its obligation to undertake the redesign and reconstruction of any streets on the Schlage site built as an interim condition relative to the OSSMP. The City will not accept any such Interim Improvement for maintenance or liability.
- j. The Project Sponsor has identified the buildout of Parcel 1 as the first construction to be completed during Phase 1.

In light of the findings above, the following conditions apply to the Phase 1 Application approval:

1. **Approval of Parcels 1, 2, and 3 and Corresponding Public Improvements:** The Planning Department approves the development of Parcels 1, 2, and 3 along with the construction of their corresponding adjacent public improvements (as shown in Exhibit E and as described in Exhibit F of the DA), including Bayshore Boulevard between Parcel 10 and Visitacion Avenue, Raymond Avenue, Leland Avenue, Leland Park, Visitacion Avenue, Street A between Raymond Avenue and Street F, and the northern sidewalk of Street F. Assuming buildout of Parcel 1 as the first construction to be completed during Phase 1, the following public improvements, as depicted in Exhibit G, shall be constructed and ready for public access before the TCO for the first building constructed is issued: Bayshore Boulevard between Parcel 10 and Raymond Avenue, Raymond Avenue, the eastern sidewalk of Street A between Raymond Avenue and Street F, the Street A roadway between Raymond Avenue and Leland Avenue, the Leland Avenue roadway, the northern sidewalk of Street F, and the pedestrian connection to the Caltrain Station. Should the Project Sponsor decide to construct on Parcels 2 or 3 prior to Parcel 1, the required public improvements necessary for completion before the TCO for the first building constructed would need to be modified.
2. **Approval of Other Phase 1 Public Improvements:** The Planning Department approves the construction of all underground utilities, including combined sewer (CS), low pressure water (LPW), joint trench (JT), 8" Portland concrete cement (PCC) as well as road base, curb, and gutter (not including sidewalks or asphalt concrete topping, which will be installed in conjunction with adjacent vertical development) for Bayshore Boulevard between Visitacion Avenue and Sunnydale Avenue, Street B, and Sunnydale Avenue between Bayshore Boulevard and Street B.
3. **Approval of Interim Improvements:** The Planning Department approves the construction of all underground utilities, including CS, LPW, JT, 8" PCC as well as road base, curb, and gutter (not including sidewalks or asphalt concrete topping) for the Interim Improvements proposed for Street F and for Street A/Sunnydale Avenue between Street F and Street B, to the extent that they do not preclude construction of the Permanent Improvements or the Multi-Modal Facility. The Project Sponsor shall

apply to Public Works for approval of both the design and construction of the reconfigured Street F and realigned and shortened Sunnydale Avenue depicted in Exhibit D as Interim Improvements per DA Section 3.5.1, which shall include security to guarantee completion and removal of the interim condition as well as security for the design and construction of the Permanent Improvements.

4. **Approval of Permanent Improvements and Multi-Modal Facility:** The City will seek to secure funding that can be advanced as a loan to the Project Sponsor to design and construct during Phase 1 the Permanent Improvements for Street F, Street A south of Street F, and Sunnydale Avenue as well as the Multi-Modal Facility as shown in Multi-Modal Study Concept 4. The City and Project Sponsor acknowledge that the final and preferred Multi-Modal Facility design may differ from the four concepts described herein and in Exhibit F attached, and that to the greatest extent possible, conditions, approvals, and funding of any such design will comply with the terms set forth for the four previously identified concepts. The City will work to identify incremental net additional design and construction costs of the Multi-Modal Facility beyond the Project Sponsor's obligations in the DA. Baseline costs will be established by the current contract schedule of values shown in the Construction Services Agreement between Sponsor and our civil infrastructure contractor, dated March 15, 2016, and the Consulting Services Agreement between Sponsor and civil engineer, dated November 17, 2014.
5. **Approval, Funding, and Construction Timeline:** The following outlines the timeline for approvals, funding and construction.
 - a. The Project Sponsor may seek permits immediately for construction of the parcels and public improvements described in Sections 1, 2, and 3 above.
 - b. Per relevant provisions of the OSSMP, the City will immediately engage with the City of Brisbane to coordinate jurisdictional issues, design standards, and funding mechanisms for the Sunnydale Avenue extension and Multi-Modal Facility designs that extend across city and county boundaries.
 - c. If the City has not secured design and construction funding to advance to the Project Sponsor for the Street F/Street A/Sunnydale Avenue Permanent Improvements, as described in Section 4 above, including the Multi-Modal Facility, by the earlier of either commencement of construction of the last parcel in Phase 1 per Exhibit E, or by the time of commencement of operation of the BRT line planned for Bayshore Boulevard, the Project Sponsor may finish these streets with sidewalks and asphalt concrete (AC) topping. In this case, Street F Interim Improvements shall be fully constructed with sidewalks and AC topping and ready for public access before the TCO of the final Phase 1 building. Street A/Sunnydale Avenue Interim Improvements may be constructed and remain in interim condition until adjacent parcel development, according to the DA's adjacency principle.
 - d. If the City secures design and construction funding to advance to the Project Sponsor for the Street F/Street A/Sunnydale Avenue Permanent Improvements, including the Multi-Modal Facility, by the earlier of either commencement of construction of the last parcel in Phase 1 per Exhibit E, or by the time of commencement of the operation of the BRT line planned for Bayshore Boulevard, these Permanent Improvements shall be designed and

constructed by the Project Sponsor and ready for public access as near the earlier of the issuance of the last TCO in Phase 1 or the commencement of operations for the Bayshore BRT line as possible; however, the TCO will not be unreasonably withheld in the event that access to these Permanent Improvements is delayed.

- e. Any funds transferred as a loan to the Project Sponsor from the City for the construction of the Street F/Street A/Sunnydale Avenue/Multi-Modal Facility Permanent Improvements shall be repaid in full before the first TCO is issued for any building on Parcels 5, 6, or 9.
6. **Conversion from Interim to Permanent Improvements:** The City will coordinate with the City of Brisbane and the Project Sponsor to design and construct the Street F and Sunnydale Avenue/Street A Permanent Improvements as well as the Multi-Modal Facility (as shown in Bayshore Multi-Modal Facility Concept 4). In particular, the Sunnydale Avenue extension into Brisbane shall remain the preferred long-term, multi-modal access point to the Bayshore Caltrain Station, per the OSSMP. The City shall be responsible to coordinate design approvals with the City of Brisbane and the Project Sponsor. The Project Sponsor shall be responsible for design and construction associated with realigning the Sunnydale Avenue and Street A intersection, including any underground infrastructure, from any approved interim condition to the permanent condition of the Sunnydale Avenue extension.
7. **Reversion to the Tentative Map:** If the Permanent Improvements for Sunnydale Avenue and Street A are implemented prior to the development of Parcel 6, the extent of Parcel 6 within the temporary public access easement on the southeast corner of the Parcel, will revert back to that which is shown on the Tentative Map (see Exhibits A and D attached). If the Permanent Improvements for Street F are implemented before the development of Parcels 8 and 9, the extent of Parcels 8 and 9 necessary to build the temporary cul-de-sac design will revert back to that which is shown on the Tentative Map (see Exhibits A and D attached).
8. **Street A Retaining Wall & Maintenance:** Due to the retaining wall built partially under Street A, Street A between Visitacion Ave and Raymond Ave shall remain private in perpetuity. The Project Sponsor or its successor shall maintain responsibility for maintaining this portion of Street A in perpetuity.
9. **Implementation of the Mitigation Monitoring and Reporting Program:** The Project Sponsor shall continue to coordinate with Environmental Planning and other City Agency staff on implementing the requirements set forth in the Mitigation Monitoring and Reporting Program (MMRP).
10. **Below Market Rate (BMR) Housing Units:** This Phase I approval is also conditioned on the Project Sponsor's good faith effort to coordinate and review with the Director of the MOHCD all inclusionary housing obligations. With an understanding that buildings are still in design review, any changes to unit counts must be made explicit to the Planning Department and MOHCD before the submittal of a building permit application, including the manner in which the inclusionary housing requirement will be satisfied.

Next Steps

Per the DA Section 3.4.4 (a), the Planning Department and Project Sponsor co-hosted a post-application informational meeting on June 14, 2017, approximately fifteen days from the initiation of the thirty-day public review period (June 2, 2017). Per DA Section 3.4.4 (a), Planning staff disseminated notice regarding the informational meeting to residents in Visitacion Valley and other interested parties. Additionally, Planning staff will submit a written informational update to the Planning Commission on this approved Phase I Application.

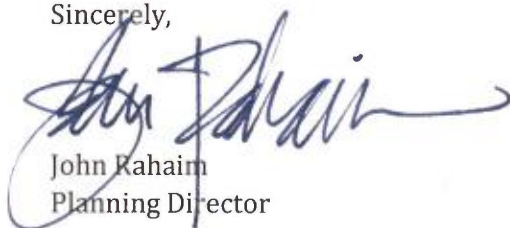
This Phase I Application Approval is effective upon receipt by the Planning Department of a response letter from the Project Sponsor agreeing to the terms and conditions herein.

Please direct any remaining questions regarding the following topics to the appropriate staff:

Design Review and Building Permit applications	Doug Vu Planning Department, Current Planning Division, SW Team	415-575-9120 doug.vu@sfgov.org
Street & Community Improvement Design	John M. Francis, Planning Department, Citywide Planning	415-575-9147 john.francis@sfgov.org
Environmental Review	Joy Navarrete, Planning Department, Environmental Planning	415-575-9040 joy.navarrete@sfgov.org
Tentative Map and Infrastructure Coordination	Barbara Moy, Public Works, Infrastructure Task Force	415-558-4050 barbara.moy@sfdpw.org

We look forward to continuing to work with you on this important project.

Sincerely,



John Rahaim
Planning Director

cc: Todd Rufo, OEWD
Ken Rich, OEWD
Emily Lesk, OEWD
Barbara Moy, DPW
Don Miller, DPW
Levon Jalalian, DPW

Molly Petrick, SFPUC
Ken Lombardi, SFFD
Michie Wong, SFFD
Ketty Fedigan, SFFD
Ronald Tom, SFDBI
Olson Lee, MOHCD
Sophie Hayward, MOHCD
Joshua Switzky, SF Planning
John M. Francis, SF Planning
Jeremy Shaw, SF Planning
Susan Gygi, SF Planning
Doug Vu, SF Planning
Esmeralda Jardines, SF Planning
Rich Sucre, SF Planning
Joy Navarette, SF Planning
Adam Varat, SF Planning
Marlena Byrne, City Attorney's Office

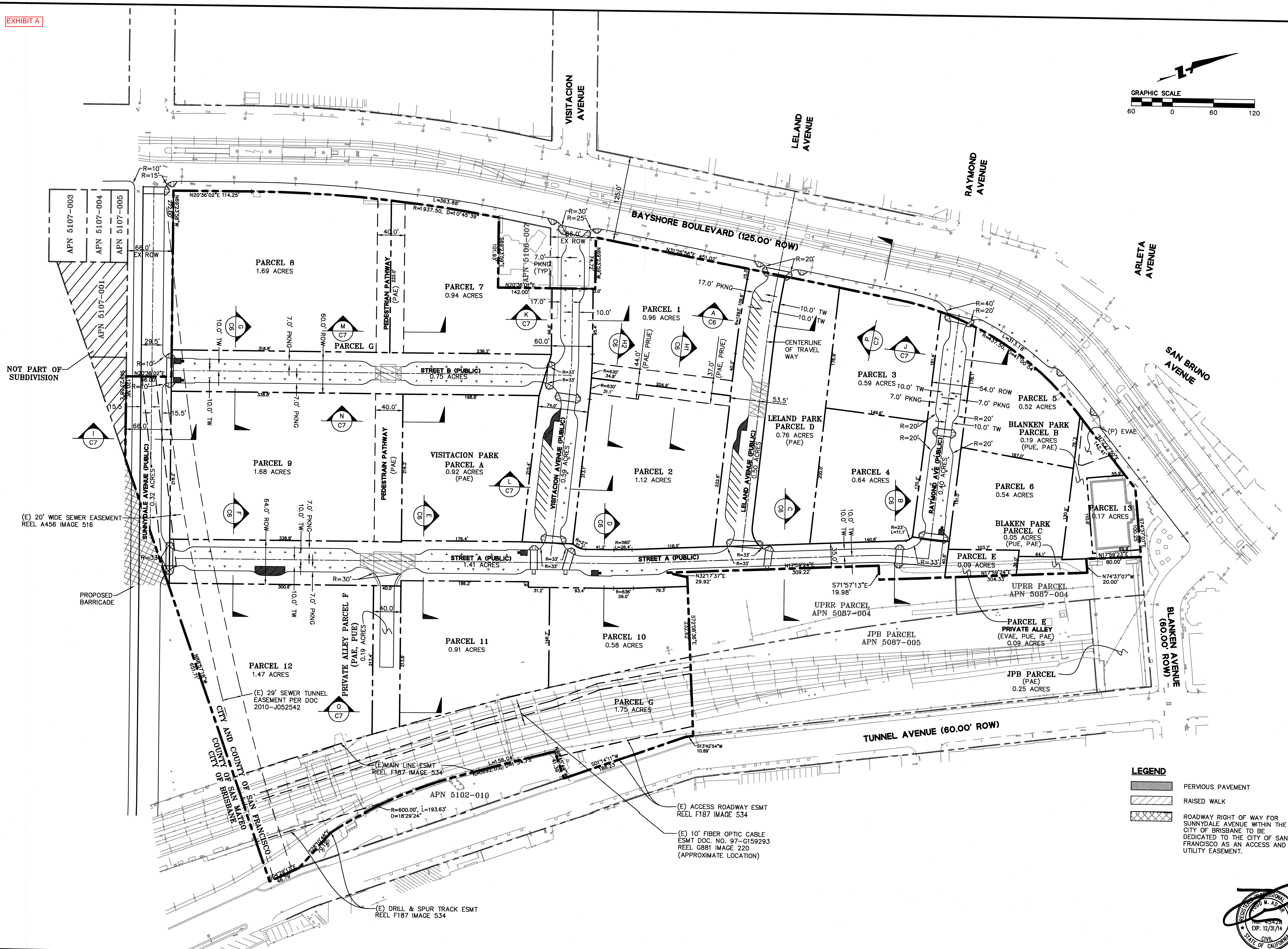


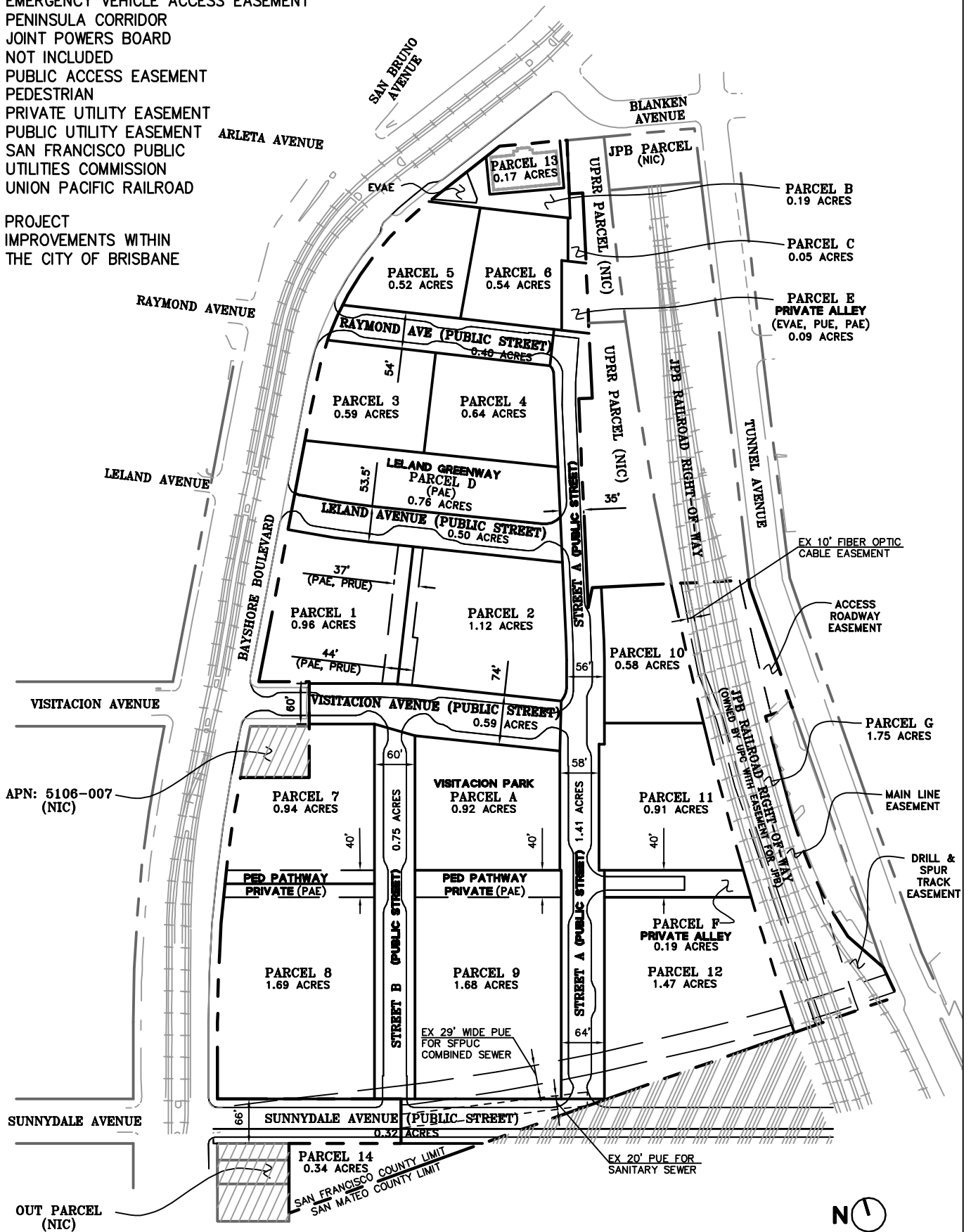
figure 42: overall streetscape master plan



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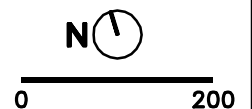
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- SFPUC SAN FRANCISCO PUBLIC UTILITIES COMMISSION
- UPRR UNION PACIFIC RAILROAD

 PROJECT IMPROVEMENTS WITHIN THE CITY OF BRISBANE



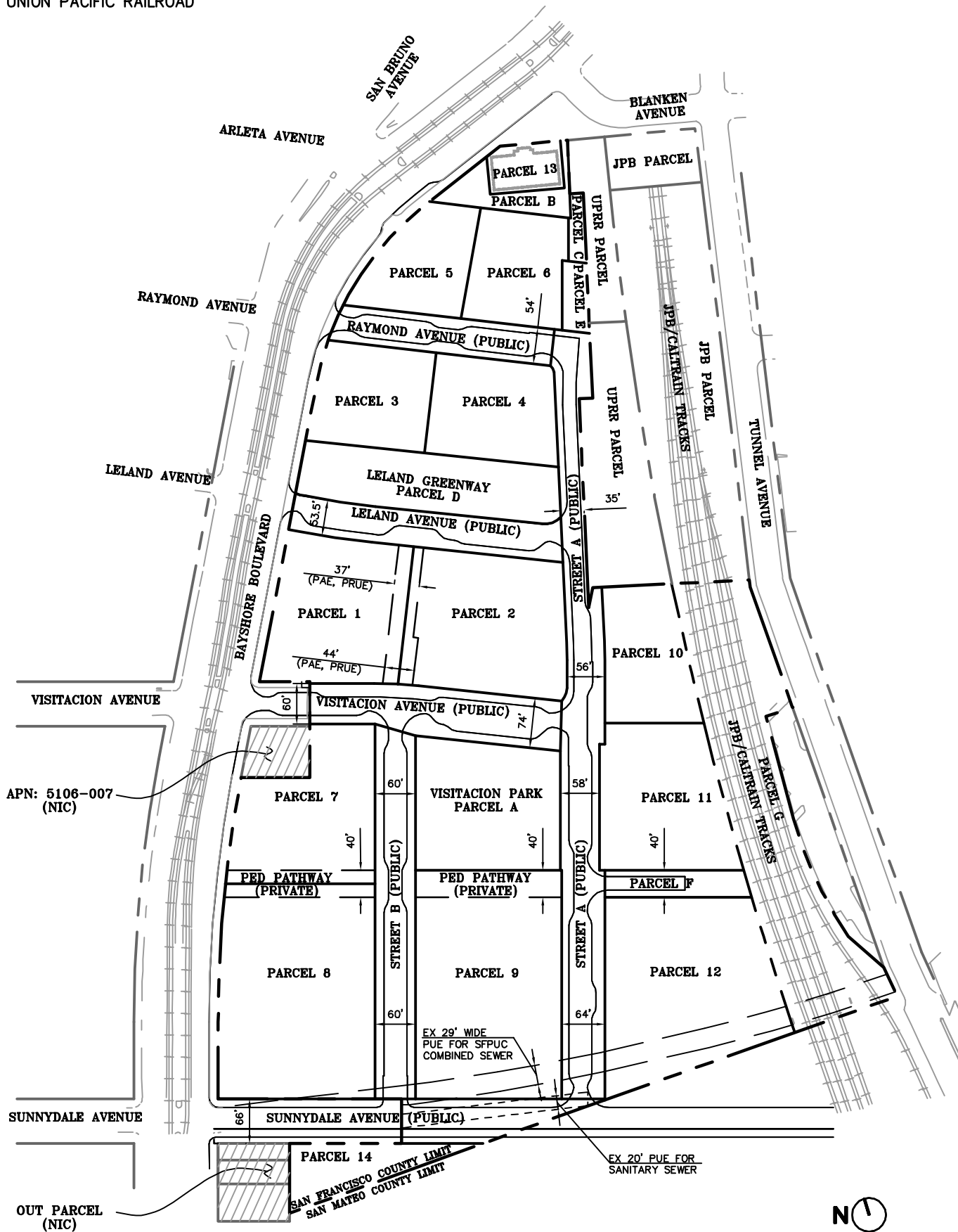
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PLOT DATE: 05-20-14
PLOT BY: jye

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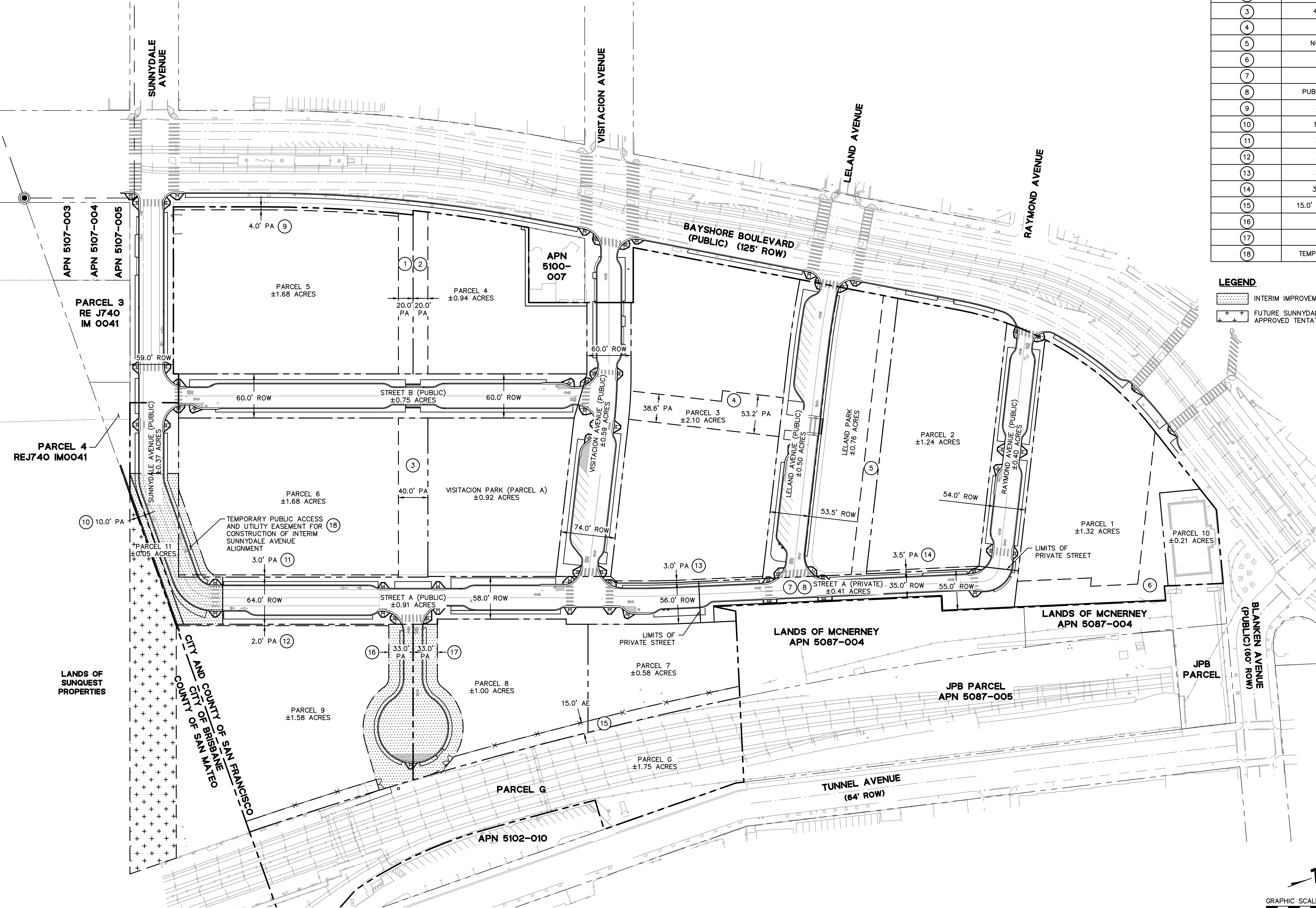
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PLOT DATE: 05-28-14 PLOTTED BY: jyes

Source: BKF ENGINEERS, 05/2014

EXHIBIT D



PROPOSED EASEMENTS AND SPECIAL RESTRICTIONS	
#	DESCRIPTION
1	20' PUBLIC ACCESS
2	20' PUBLIC ACCESS
3	40' PUBLIC ACCESS
4	PUBLIC ACCESS
5	NO-BUILD COVENANT
6	PUBLIC ACCESS
7	PUBLIC ACCESS
8	PUBLIC UTILITY EASEMENT
9	4' PUBLIC ACCESS
10	10' PUBLIC ACCESS
11	3' PUBLIC ACCESS
12	2' PUBLIC ACCESS
13	3' PUBLIC ACCESS
14	3.5' PUBLIC ACCESS
15	15.0' JPB ACCESS EASEMENT
16	PUBLIC ACCESS
17	PUBLIC ACCESS
18	TEMPORARY PUBLIC ACCESS

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- INTERIM IMPROVEMENTS
- FUTURE SUNNYDALE ROW PER APPROVED TENTATIVE MAP.

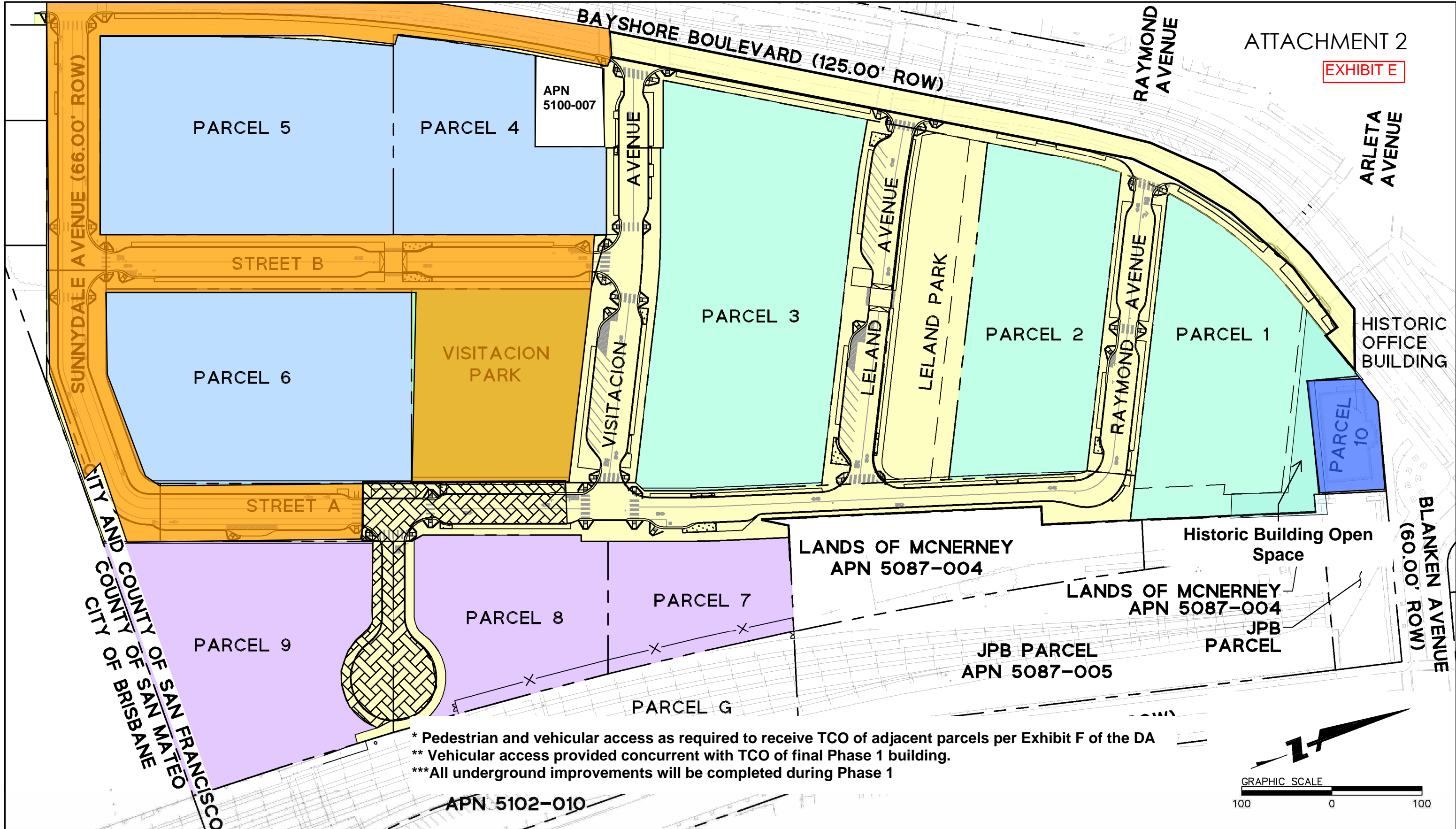
VISITACION VALLEY REDEVELOPMENT, ZONE 1
2201 BAYSHORE BOULEVARD IMPROVEMENT PLANS
PROPOSED EASEMENT MASTER PLAN
CITY AND COUNTY OF SAN FRANCISCO, CALIFORNIA



Revisions	
No.	Date
1	12.23.2016
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ATTACHMENT 2

EXHIBIT E



* Pedestrian and vehicular access as required to receive TCO of adjacent parcels per Exhibit F of the DA
** Vehicular access provided concurrent with TCO of final Phase 1 building.
*** All underground improvements will be completed during Phase 1

DRAWING NAME: K:\2014\140086\ENG\PHASE APPLICATION\Project Site Layout.dwg
PLOT DATE: 05-04-16
PLOT BY: wats

LEGEND

- | | | | |
|-----|--------------------------------|--|---------------------------------------------------------------|
| --- | LOT BOUNDARY | | PRIVATE DEVELOPMENT PHASE 1 |
| --- | PUBLIC IMPROVEMENTS PHASE 1* | | PRIVATE DEVELOPMENT PHASE 2 |
| --- | PUBLIC IMPROVEMENTS PHASE 1** | | PRIVATE DEVELOPMENT PHASE 3 |
| --- | PUBLIC IMPROVEMENTS PHASE 2*** | | HISTORIC OFFICE BUILDING RENOVATION BY DELIVERY OF UNIT 1,200 |
| --- | PUBLIC IMPROVEMENTS PHASE 3 | | |

DATE: 5.4.2016
SCALE: 1"=100'
DESIGN: JW
DRAWN BY: JH
APPROVED: JW
JOB NO: 20140086



BAYSIDE DEVELOPMENT LLC
150 EXECUTIVE PARK BLVD, STE 3800
SAN FRANCISCO, CA 94134
415/468-6676
415/468-6678 (FAX)
ENGINEERS / SURVEYORS / PLANNERS
150 CALIFORNIA STREET, STE 650
SAN FRANCISCO, CA 94111
415/930-7900
415/930-7949 (FAX)

VISITACION VALLEY REDEVELOPMENT
PHASE APPLICATION

PROJECT SITE PLAN

The Bayshore Multi-modal Facility would include the following elements:

Pedestrian Access
行人專用道



Bike Share
自行車短期租賃



Bicycle Access
自行車專用道



Protection from the Sun and Wind
半封閉式候車站台



Wayfinding/Information
地圖/指示牌



Enhanced pedestrian connections between
future Bus Rapid Transit, buses & rail transit



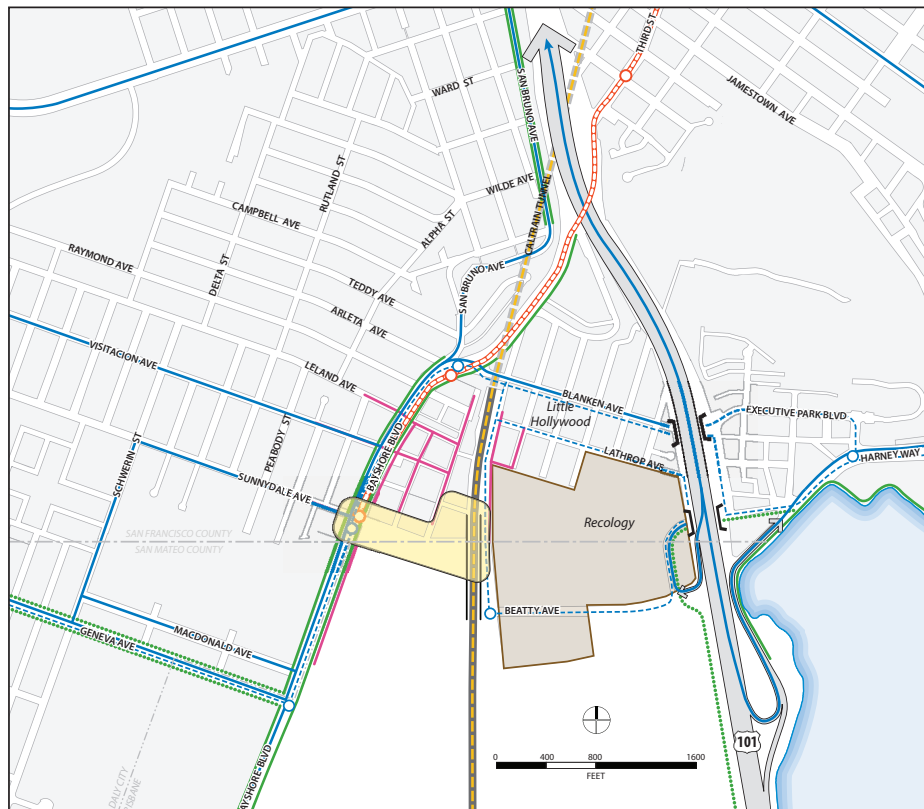
Shuttle Loading Area
巴士站



Public Seating
公共休息區域



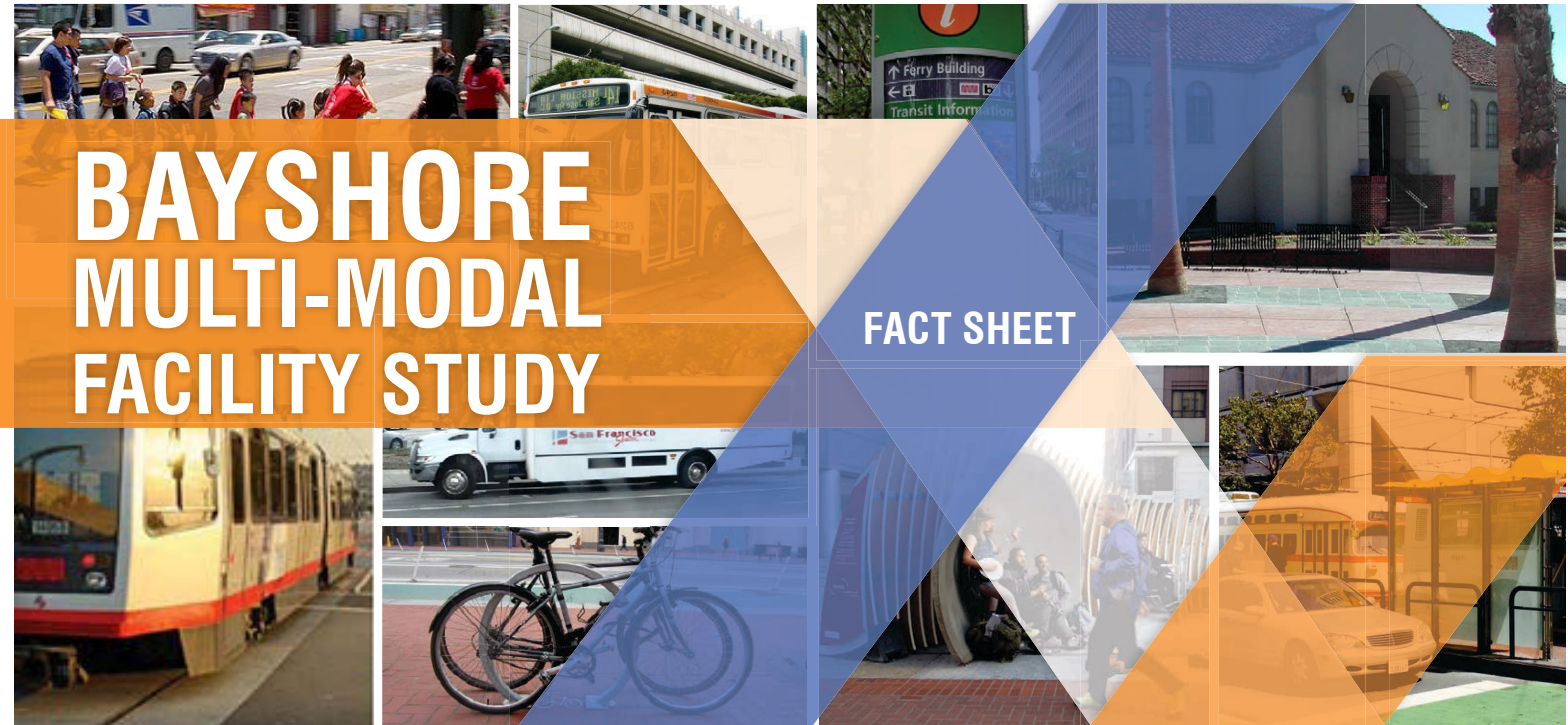
Study area map and preferred multi-modal facility location on Sunnydale Avenue



- Preferred Multi-modal Facility Location on Sunnydale Ave
- Caltrain Rail
- Existing Caltrain Platforms
- Existing/Planned Class I/II Bicycle Facilities
- Direct Walking Routes to Potential Multi-Modal Facility from Outside of 1/4 Mile Radius
- Existing Muni Metro (T-Third)
- Existing and Committed Bus Transit Service
- Potential BRT Alignments and Station Locations in Study Area

* If projected conditions change, other locations for a facility or facility elements are possible

The City and County of San Francisco is independently conducting the study with a grant from the Metropolitan Transportation Commission (MTC). Throughout the Study, San Francisco Planning will coordinate with Caltrain, MTC, the City of Brisbane, SamTrans, and several San Francisco agencies including San Francisco County Transportation Authority (SFCTA), Municipal Transportation Agency (SFMTA), Office of Community Investment and Infrastructure (OCII), Office of Economic and Workforce Development (OEWD), and the Office of the Mayor.



PROJECT BACKGROUND

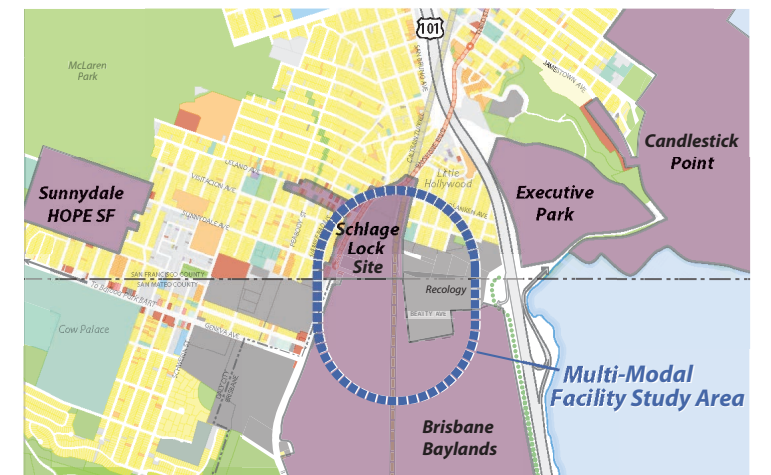
Extensive growth in the bi-county, Bayshore area is placing significant pressure on regional and local transportation systems. To meet both current neighborhood needs as well as the expected increase in travel and commuting demand, several transportation improvements have been identified for the bi-county area; including Muni Forward service enhancements, US-101/Candlestick Point interchange, Caltrain Modernization and Geneva-Harney Bus Rapid Transit.

A multi-modal facility is one significant way to better connect these improvements and serve future transportation demand in the bi-county area. A facility will also support regional priorities of coordinating land use and transportation planning, as well as reducing greenhouse gas (GHG) emissions.

The Bayshore Multi-Modal Facility Study is analyzing alternative locations, conceptual designs, and implementation plans for such a facility in the Bayshore area based on consultant analysis, public agency input and community feedback.

WHAT IS A MULTI-MODAL FACILITY?

Multi-modal facilities link transportation services and infrastructure within a single location or area, providing better access and connectivity for people using regional and rapid transit, local buses and shuttles, private vehicles (cars/trucks), cycling, and walking. Facilities can take many forms including: special street designs, a kiosk, shared platforms or even a station. For example elements which can be part of a facility, see the back of this fact sheet.

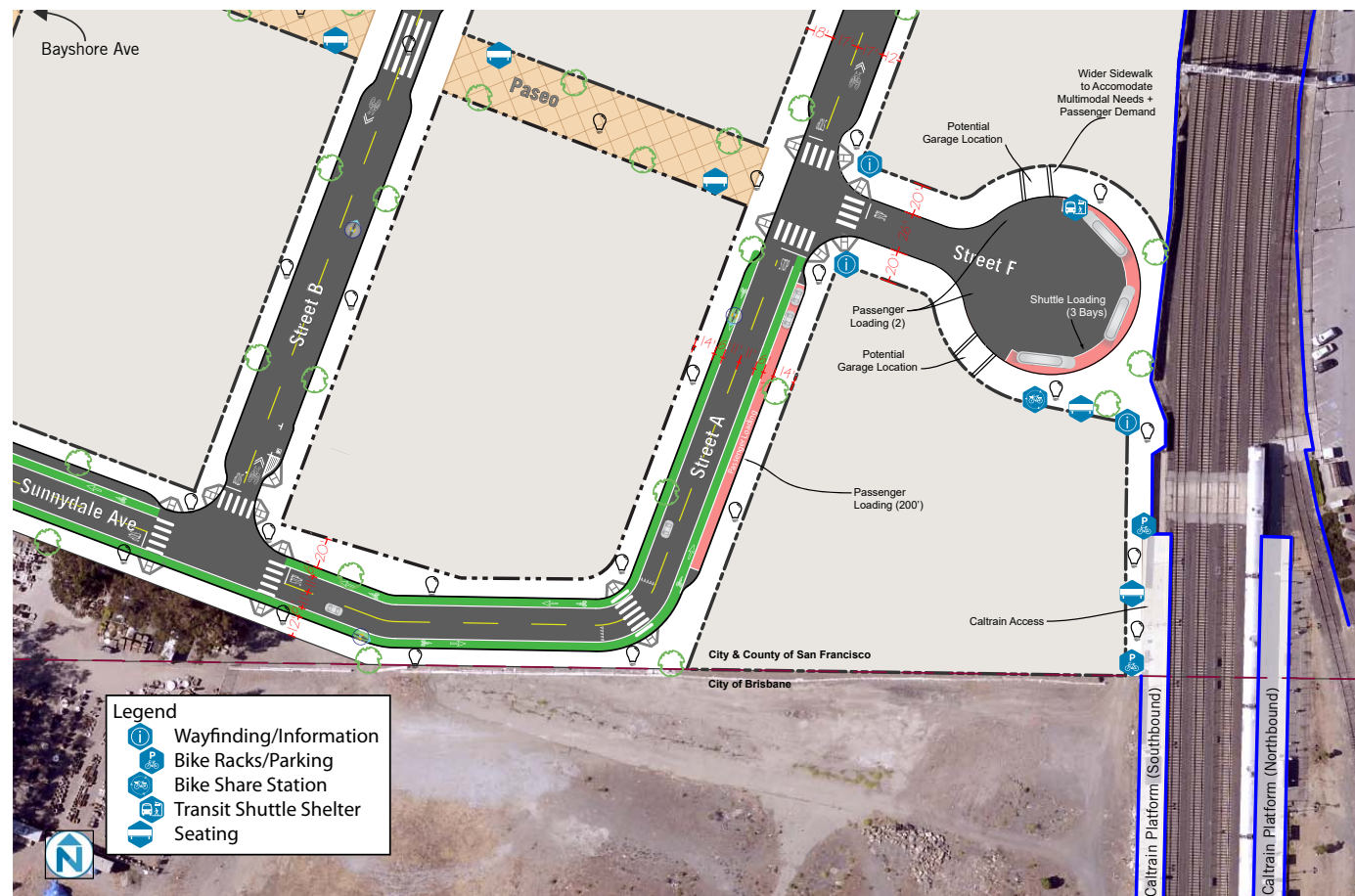


FOR MORE INFORMATION

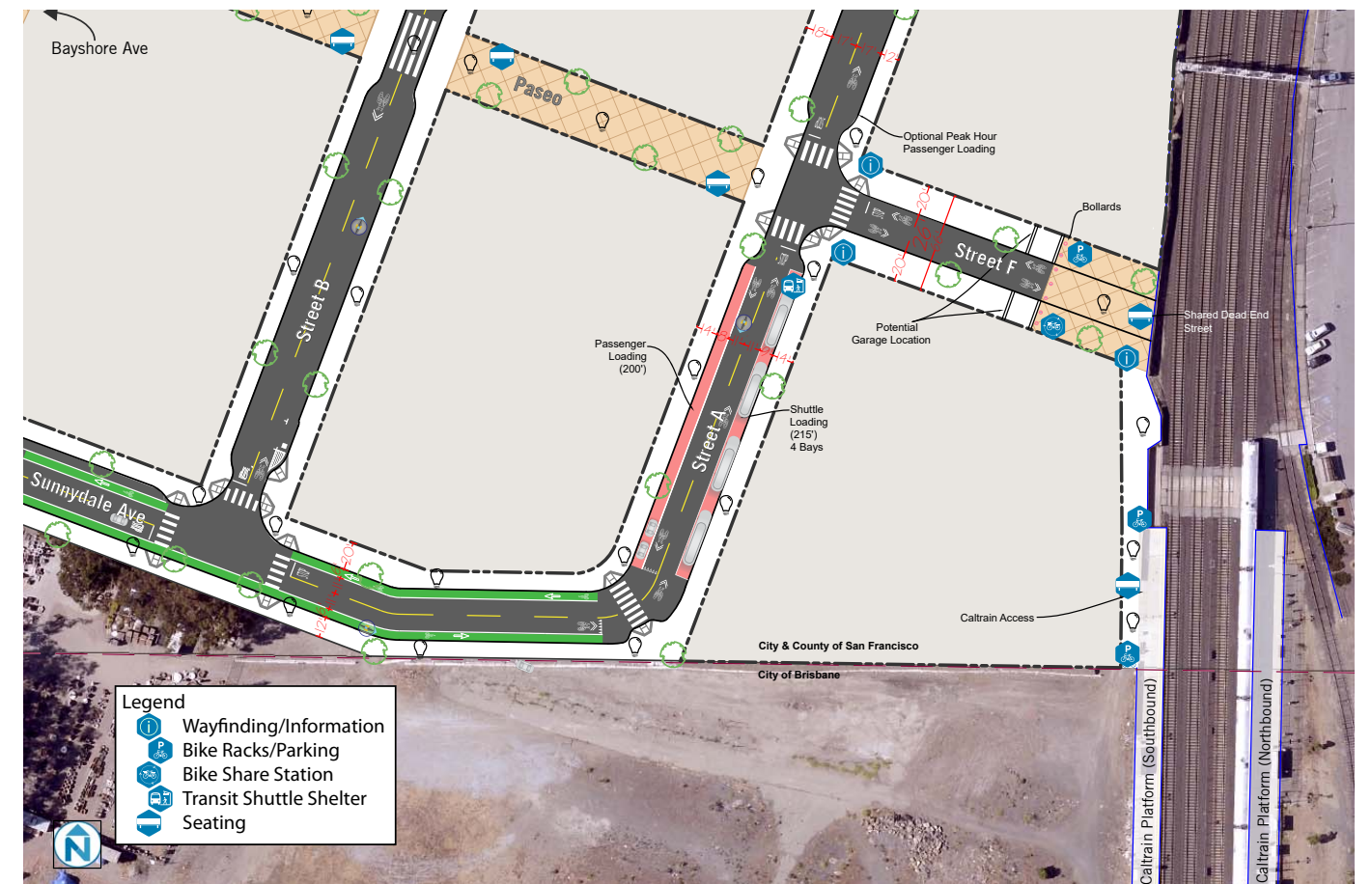
<http://sf-planning.org/bayshore>

Jeremy Shaw, Project Manager
San Francisco Planning Department
Jeremy.Shaw@sfgov.org | (415) 575-9135

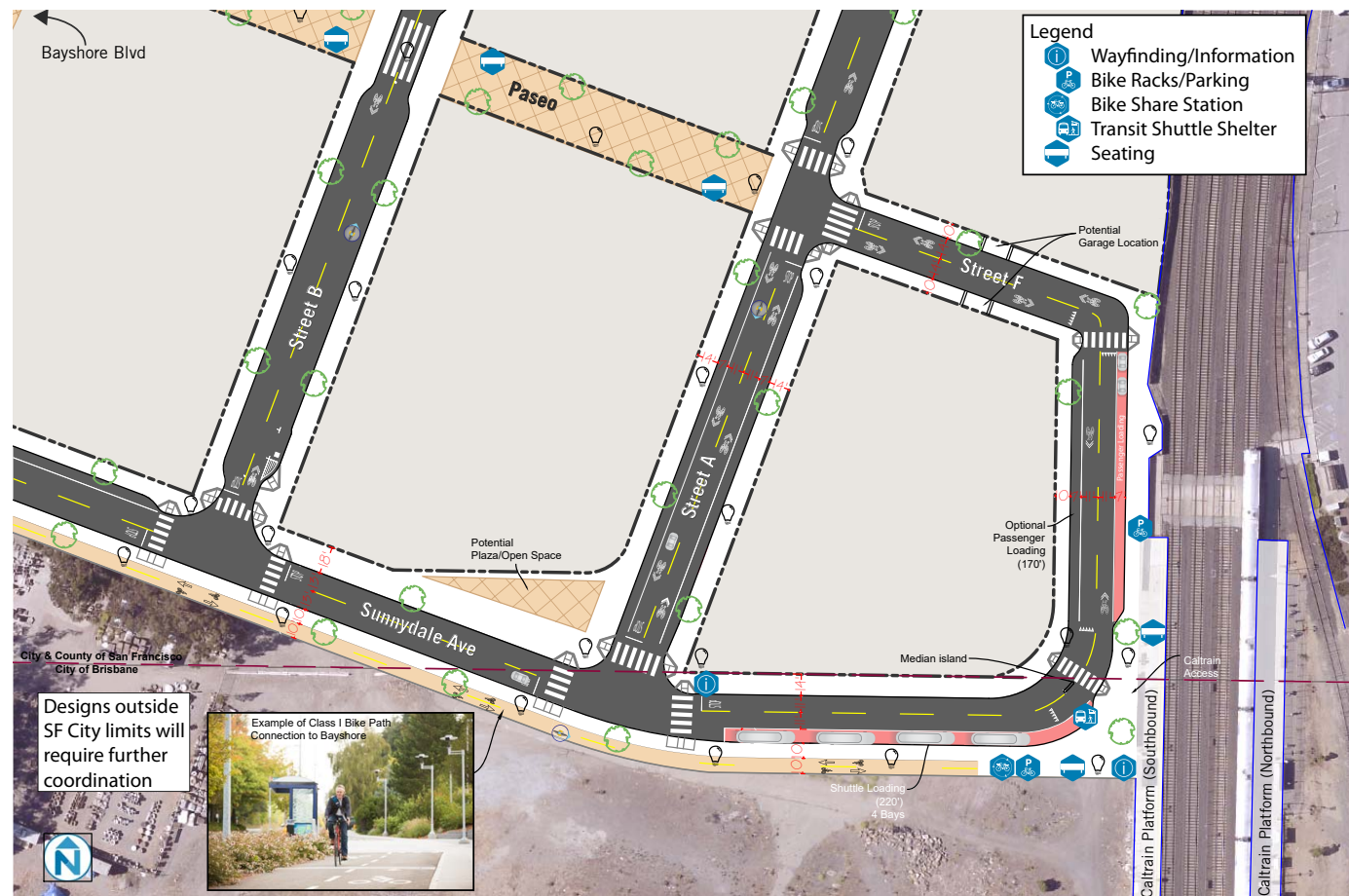
BAYSHORE MULTI-MODAL FACILITY STUDY CONCEPT ALTERNATIVES



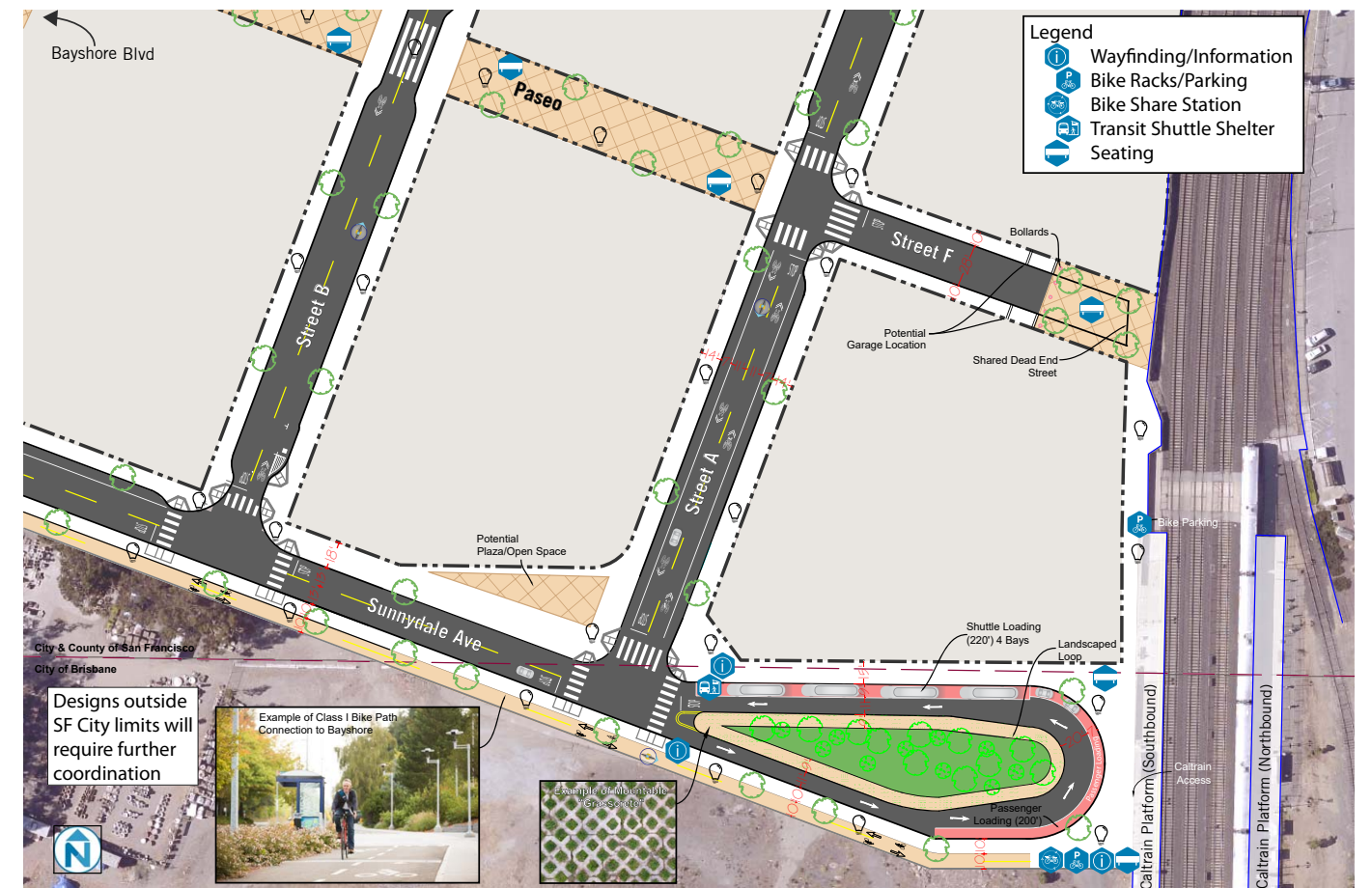
ALTERNATIVE 1: Facility access within San Francisco; consistent with original plans for Schlage Lock development



ALTERNATIVE 2: Facility access within San Francisco; all transfer activity on Street A

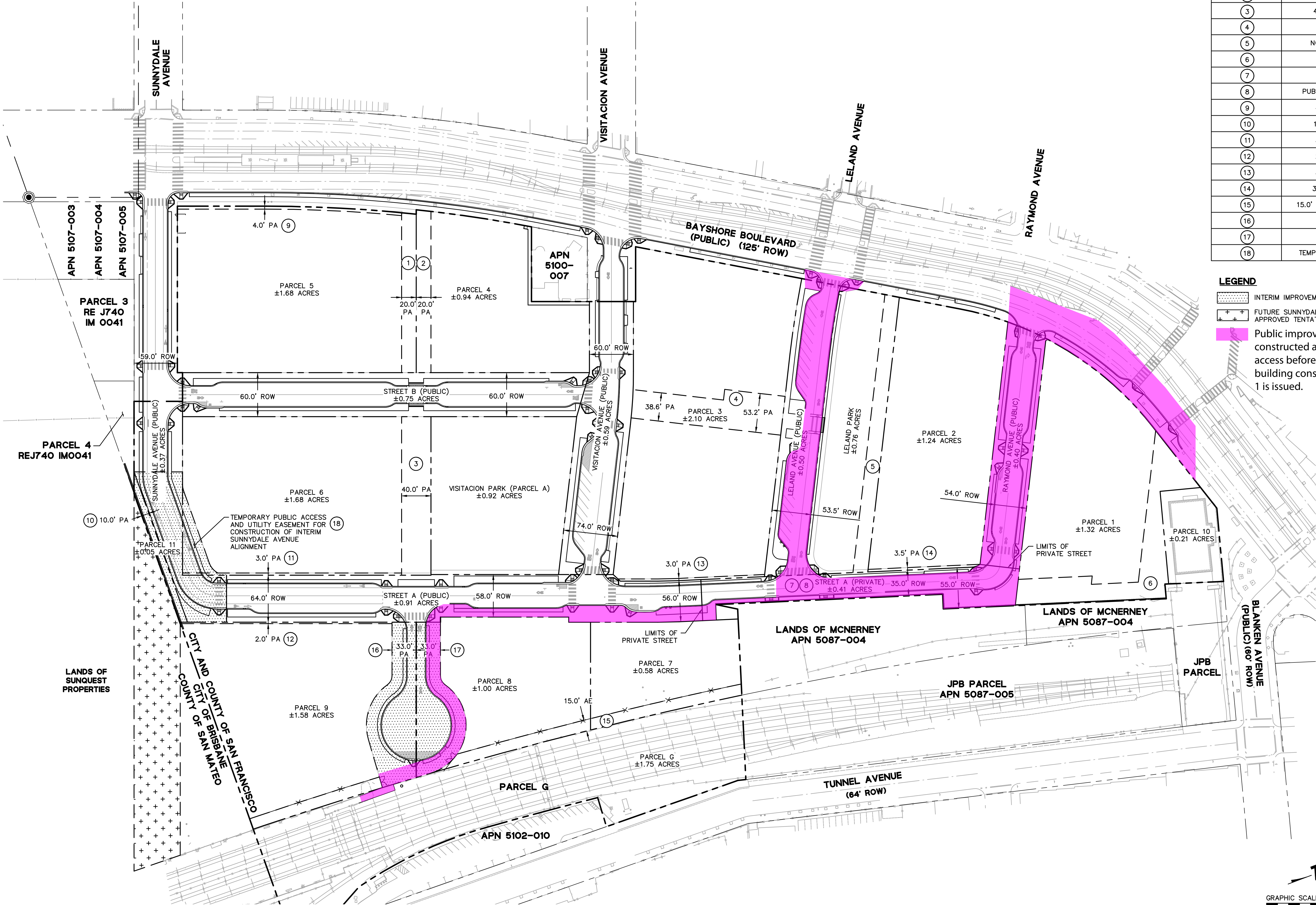


ALTERNATIVE 3: Sight line from Bayshore Blvd; protected bike path; the most space for all vehicular loading



ALTERNATIVE 4: Sight line from Bayshore Blvd; protected bike path; vehicular loading near platform; the most developable land

EXHIBIT G



PROPOSED EASEMENTS AND SPECIAL RESTRICTIONS	
#	DESCRIPTION
1	20' PUBLIC ACCESS
2	20' PUBLIC ACCESS
3	40' PUBLIC ACCESS
4	PUBLIC ACCESS
5	NO-BUILD COVENANT
6	PUBLIC ACCESS
7	PUBLIC ACCESS
8	PUBLIC UTILITY EASEMENT
9	4' PUBLIC ACCESS
10	10' PUBLIC ACCESS
11	3' PUBLIC ACCESS
12	2' PUBLIC ACCESS
13	3' PUBLIC ACCESS
14	3.5' PUBLIC ACCESS
15	15.0' JPB ACCESS EASEMENT
16	PUBLIC ACCESS
17	PUBLIC ACCESS
18	TEMPORARY PUBLIC ACCESS

LEGEND

- INTERIM IMPROVEMENTS
- FUTURE SUNNYDALE ROW PER APPROVED TENTATIVE MAP.
- Public improvements to be constructed and ready for public access before the TCO for the first building constructed during Phase 1 is issued.

150 CALIFORNIA ST
SUITE 600
SAN FRANCISCO, CA 94111
(415) 930-7900



VISITACION VALLEY REDEVELOPMENT, ZONE 1
2201 BAYSHORE BOULEVARD IMPROVEMENT PLANS
PROPOSED EASEMENT MASTER PLAN
CITY AND COUNTY OF SAN FRANCISCO, CALIFORNIA



Revisions	
No.	Date
1	12.23.2016
Scale 1" = 60'	
Design	JCW
Drawn	AMJ
Approved	MAO
Job No	20140086
Drawing Number:	
C1.09	
9 OF 157	

PLANS FOR PERMIT OF COMBINED SEWER ONLY. NOT VALID FOR SITE IMPROVEMENTS