

Request for Special Temporary Authority and Further Extension of Deadline for Submitting Invoices for Reimbursement to the TV Broadcaster Relocation Fund

RNN National, LLC (“RNN”), licensee of television station KCNS(TV), San Francisco, California (FCC Facility ID No. 71586) (the “Station”), pursuant to Sections 1.3 and 73.1635 of the Commission’s rules, respectfully requests Special Temporary Authority (“STA”) and a further extension of the Commission’s rules as necessary to allow RNN additional time to submit invoices for reimbursement to the TV Broadcaster Relocation Fund (“Reimbursement Fund”). RNN requests that the Station be given until August 31, 2024, to submit invoices.

RNN cannot meet the existing August 31, 2023, deadline to submit invoices because, due to circumstances beyond its control, the tower work related to the Station’s post-auction permanent facilities is still not complete. RNN is a non-owner tenant on Sutro Tower in San Francisco. As the Bureau is aware, the local permitting process required for the completion of tower work related to the post-auction repack has just concluded and the tower work will continue for several more years. Accordingly, for the reasons discussed below, there is good cause for grant of RNN’s STA and extension request, and grant will serve the public interest.

Background

On January 21, 2022, the Incentive Auction Task Force and the Media Bureau released a Public Notice reminding all full power and Class A television stations assigned transition completion dates in phases 6 – 10 of the Transition Scheduling Plan that they must submit all remaining invoices for reimbursement from the Reimbursement Fund by March 22, 2022.¹ The

¹ See *TV Broadcaster Relocation Fund Filing Deadline Approaches in Sixty Days*, Public Notice, DA 22-72 (IATF/MB Jan. 21, 2022). See also *Incentive Auction Task Force and Media Bureau Remind Reimbursement Program Participants that the Third and Final Filing Deadline Approaches in 90 Days*, Public Notice, DA 22-619 (IATF/MB June 8, 2022) at fn. 5 (Discussing how a station requesting a further extension of the September 6 invoice upload deadline must

notice outlined a procedure for requesting a limited extension of the invoice upload deadlines.² Specifically, if a station “faces circumstances beyond its control, however, we will consider a limited extension by means of shifting to the third, and last, invoice filing assignment An entity requesting such a shift will have to provide evidence that circumstances requiring the extension were outside of its control, such as local zoning or a force majeure event occurring proximate to the final submission deadline.”³ RNN applied for, and was granted, an extension of the deadline for the Station due to circumstances beyond its control, first to September 6, 2022, then to January 17, 2023, then to April 30, 2023, then to May 31, 2023, and most recently to August 31, 2023.⁴

The Station was assigned to Phase 8 of the Transition Scheduling Plan. While the Station moved to its post-auction channel and post-auction facilities on time, the local permitting process has just concluded and work on Sutro Tower is ongoing. Specifically, the final construction work on the tower must be completed and then the tower must be painted. RNN’s principals and advisors have been in regular contact with the principal and counsel for the tower owner, Sutro

similarly “provide evidence that circumstances requiring the extension were outside of its control, such as local zoning or a force majeure event occurring proximate to the final submission deadline.”)

² *Id.* at n.4.

³ *Id.* at ¶ 2.

⁴ See FCC File No. 0000185064 (request for legal STA and extension of the March 22, 2022 invoice upload deadline for the Station as granted on March 21, 2022); FCC File No. 0000196963 (request for legal STA and extension of the September 6, 2022 invoice upload deadline for the Station as granted on August 31, 2022); FCC File No. 0000205016 (request for extension of legal STA and extension of the January 17, 2023 invoice upload deadline for the Station as granted on December 20, 2022); and FCC File No. 0000214243 (request for extension of legal STA and extension of the April 30, 2023 invoice upload deadline for the Station as granted on May 2, 2023); FCC File Number 0000215794 (request for extension of legal STA and extension of the May 31, 2023 invoice upload deadline for the Station as granted on June 9, 2023).

Tower, Inc. (“STI”), and have pressed them to accelerate the local zoning process and construction schedule. As a non-owner tenant on the tower, RNN cannot control the construction schedule or the efforts by STI to obtain the necessary permits and zoning approvals from the City and County of San Francisco.

As noted, the local zoning authorities have only just approved the issuance of the final permit necessary to complete work on the tower, as the hearing for the final permit took place on May 25, 2023. The final Discretionary Review Action (attached as Exhibit A) was then published by the San Francisco Planning Department on July 18, 2023. After publication, the final Discretionary Review Action was sent to the Department of Building Inspection, and as far as RNN is aware, the Department of Building Inspection still has not issued the last permit. In the meantime, STI has continued to prepare the tower for painting and has also worked to implement the conditions of approval that were imposed by the Planning Department in connection with the final permit (see Exhibit B).

There is Good Cause for an STA and Waiver

Under Section 1.3 of the Commission’s rules, the Commission may waive its rules for “good cause shown.”⁵ This standard requires grant of a waiver when (a) the particular facts make strict compliance inconsistent with the public interest, (b) special circumstances warrant a deviation from the general rule, and (c) such deviation will serve the public interest.⁶ In evaluating waiver requests, the Commission considers hardship, equity, or whether a waiver will result in “more effective implementation of overall policy” than enforcing its rule as written.⁷

⁵ 47 C.F.R. § 1.3.

⁶ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁷ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

RNN respectfully submits that a grant of the request to shift the Station's deadline to submit invoices for reimbursement from the Reimbursement Fund to August 31, 2024, would be in the public interest. A further extension of the reimbursement deadline will allow the Station to submit invoices paid after the current deadline and receive payment for legitimate expenses directly caused by the Station's post-auction channel change. In contrast, retaining the August 31, 2023, deadline could force RNN to incur a significant amount of repack-related expenses itself, which is not in the public interest. RNN has submitted for reimbursement all invoices for the Station that are available as the filing of this request. RNN will submit all remaining Station invoices promptly upon RNN's receipt of those invoices.

For the reasons stated herein, RNN respectfully requests that the Commission grant its request for a legal STA and waiver as needed to shift the Station's invoice upload deadline from August 31, 2023, to August 31, 2024.

Exhibit A

Discretionary Review Action DRA-827



DISCRETIONARY REVIEW ACTION DRA-827

HEARING DATE: MAY 25, 2023

Record No.: **2019-000499DRM**
Project Address: **1 La Avanzada Street – Sutro Tower**
Building Permit: 2019.0108.9873
Zoning: RH-1(D) (Residential-House, One Family-Detached) District
40-X Height and Bulk District
Block/Lot: 2724/003
Project Sponsor: Sutro Tower Incorporated, represented by
Kristen Thall Peters, Womble Bond Dickinson (US) LLP
201 California Street, 17th Floor
San Francisco, CA 94111
Staff Contact: Jeff Horn – (628) 652-7366
Jeffrey.Horn@sfgov.org

ADOPTING FINDINGS RELATED TO TAKING DISCRETIONARY REVIEW OF CASE NO. 2019-000499DRM AND THE APPROVAL OF BUILDING PERMIT NO. 2019.0108.9873 PROPOSING TO LEGALIZE AND AUTHORIZE THE PERMANENT REMOVAL OF THE EXTERIOR, METAL-PANEL CLADDING OF SUTRO TOWER’S VERTICAL ELEMENTS (LEGS) AND THE REPAINTING OF THE TOWER WITH CONDITIONS OF APPROVAL TO MEMORIALIZE THE TOWER’S VERTICAL CLADDING WITHIN THE RH-1(D) (RESIDENTIAL, HOUSE, ONE-FAMILY -DETACHED) ZONING DISTRICT AND A 40-X HEIGHT AND BULK DISTRICT.

Preamble

On January 8, 2019, Raul Velez of Sutro Tower, Inc. filed for Building Permit Application No. 2019.0108.9873 proposing the replacement of existing interior-facing corrugated metal panels located on Sutro Tower’s horizontal trusses at the second through fourth levels (the three lower trusses of the Tower) within the RH-1(D) (Residential, House, One-Family-Detached) District and a 40-X Height and Bulk District.

Pursuant to Section 306.9 of the Planning Code, Mandatory Discretionary Review is required for building permit applications for work to be performed on Sutro Tower and for any ground level improvements.

On April 6, 2023, and updated on May 24, 2023, the Department issued an Addendum (Addendum 4) to the Final Environmental Impact Report (EIR) for the Sutro Tower Digital Television Project pursuant to the requirements of the California Environmental Quality Act and Chapter 31 of the San Francisco Administrative Code. The San Francisco Planning Commission certified the Final EIR, Planning Department Case No. 2007.0206E, on October 23,

2008 through approval of Motion No. 17731. The project analyzed in the Final EIR comprised the conversion of television antennas on Sutro Tower from an analog and digital system to an all-digital system (approved project). On May 25, 2023, the San Francisco Planning Commission (hereinafter “Commission”) conducted a duly noticed public hearing at a regularly scheduled meeting on Discretionary Review Application 2019-000499DRM.

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.

Action

The Commission hereby does take Discretionary Review requested in Record No. 2019-000499DRM and approves Building Permit Application 2019.0108.9873 with the Standard Antenna Conditions and Preservation Conditions of Approval with the following amendments:

1. Delete the last sentence of the first paragraph of the first Preservation Condition of Approval;
2. Delete the second Preservation Condition of Approval in its entirety;
3. Delete the last paragraph of the fourth Preservation Condition of Approval; and
4. Include Condition 1b (submitted by the Sponsor) related to Student Engagement with updated references.

The Conditions contained in this document were imposed by the Planning Commission on the antenna-related permits for Sutro Tower located at 1 La Avanzada Street in San Francisco, California, at its hearing on February 16, 2006, and subsequently amended pursuant to those certain Planning Commission hearings of January 27, 2011, and July 18, 2019. Pursuant to the agreement between Sutro Tower, Inc. and the Neighborhood Representatives (as defined in Section C(2) below), the Conditions have been further amended as more fully set forth below. It is the intent of the Commission, as so moved and adopted as Commission policy at such hearings, to impose these standard conditions (as a Notice of Special Restrictions) regarding inspections, RF levels (monitoring), operation and neighborhood communication (including notification) on all future antenna-related permits for Sutro Tower.

A. STRUCTURAL INSPECTIONS: In June of 1999, the Department of Building Inspection accepted an Inspection Protocol governing Sutro Tower (the "Tower"). For clarification, all references to the Tower herein shall be deemed to include the structure of the antenna tower itself, as well as its structural members, supports, fixtures, connections and attachments. Sutro Tower, Inc. (hereinafter STI) shall adhere to said Inspection Protocol as summarized below:

1. Annual Inspection (“Routine Inspection”):

- a. STI shall have an independent professional engineer and/or testing laboratory approved by the Department of Building Inspection (“independent laboratory”) conduct Annual Inspections. The Annual Inspection shall consist of visual observations and/or measurements needed to determine the physical and functional condition of the Tower and to identify any changes from the Baseline Inspection that was conducted in 1999 pursuant to the Inspection Protocols or from previously

recorded conditions. Each Annual Inspection shall cover approximately one-third of the Tower such that the entire structure will be evaluated over a three-year interval.

- b. A California-licensed professional engineer retained by STI (“licensed engineer”) shall review the results of the Annual Inspection, along with prior inspection results, to determine the extent of remedial action that may be necessary. The licensed engineer shall also ensure that the detailed inspection plan for subsequent years is modified to reflect any additional inspection requirements or areas where more in-depth inspection is required.
- c. STI shall undertake all additional inspections recommended by the licensed engineer as a result of the Annual Inspection.
- d. STI shall undertake all remedial action recommended by the licensed engineer as a result of the Annual Inspection. A Special Inspection, as described in Section A(4) below, shall thereafter be conducted to assess the performance of any repairs resulting from the Annual Inspection.
- e. A report of each Annual Inspection shall be prepared by the licensed engineer and submitted to the San Francisco Planning Department and to the Department of Building Inspection within 45 days of STI’s receipt of the independent laboratory’s inspection report, and those reports shall be made available to members of the public.
- f. STI shall also send a copy of the Annual Inspection reports to each of the Neighborhood Representatives.

2. In-Depth Inspection:

- a. In 2004 and every five years thereafter or as otherwise required by the licensed engineer during an Annual Inspection or Event Inspection, as described in Section A(3) below, STI shall have an independent laboratory conduct a close-up, hands-on inspection of one or more structural members or connections to identify problems not readily detectable with a visual review in the Annual Inspection.
- b. If recommended by the licensed engineer to fully ascertain the presence or extent of damage, STI shall have non-destructive field-testing, load tests, and/or materials tests performed by an independent testing laboratory.
- c. STI shall undertake all additional inspections recommended by the licensed engineer as a result of the In-Depth Inspection.
- d. STI shall undertake all remedial action recommended by the licensed engineer as a result of the In-Depth Inspection. A Special Inspection shall thereafter be conducted to assess the performance of any repairs resulting from the In-Depth Inspection.
- e. A report of each In-Depth Inspection shall be prepared by the licensed engineer and submitted to the Planning Department and to the Department of Building Inspection within 45 days of STI’s receipt of

the independent laboratory's inspection report, and those reports shall be made available to members of the public.

- f. STI shall also send a copy of the In-Depth Inspection reports to each of the Neighborhood Representatives.

3. Event Inspection (“Unscheduled Inspection”):

- a. As required by a licensed engineer, STI shall have an independent laboratory conduct an Event Inspection as soon as practical after the occurrence of a severe storm, earthquake, mudslide, or other triggering environmental event that exceeds the design load of the Tower (winds in excess of 70 miles per hour at 10 meters in elevation, or a 1000-year seismic event as defined in the dynamic analysis report of June 1999).
- b. Following a severe storm or earthquake, particular inspection attention shall be given to detecting damage and indirect signs of damage such as areas of missing cladding, paint cracking due to yielding of steel members, spalling of concrete, misalignment in connections, loosening or lengthening of bolts, or obvious structural displacements. Depending on the severity of the triggering storm or earthquake, an In-Depth Inspection may be appropriate in areas of local damage to the Tower.
- c. STI shall undertake all additional inspections recommended by the licensed engineer as a result of the Event Inspection.
- d. STI shall undertake all remedial action recommended by the licensed engineer as a result of the Event Inspection. A Special Inspection shall thereafter be conducted to assess the performance of any repairs resulting from the Event Inspection.
- e. A report of each Event Inspection shall be prepared by the licensed engineer and submitted to the Planning Department and to the Department of Building Inspection within 45 days of STI's receipt of the independent laboratory's inspection report, and those reports shall be made available to members of the public.
- f. STI shall also send a copy of the Event Inspection reports to each of the Neighborhood Representatives.

4. Special Inspections:

- a. STI shall have an independent laboratory conduct a Special Inspection to monitor repairs resulting from previous inspections or to otherwise assess the performance of repairs implemented to ensure the structural integrity of the Tower. The Special Inspection shall be undertaken as part of an Annual Inspection conducted within one year after completion of the repair, if practical, or during the next inspection cycle.
- b. STI shall have an independent laboratory conduct a Special Inspection as recommended by a licensed engineer for any reason, including monitoring defects, damage, local corrosion, or other conditions potentially affecting the structural integrity of the Tower.

- c. STI shall undertake all additional inspections recommended by the licensed engineer as a result of the Special Inspection.
- d. STI shall undertake all remedial actions recommended by the licensed engineer as a result of the Special Inspection.
- e. A report of each Special Inspection shall be prepared by the licensed engineer and submitted to the Planning Department and the Department of Building Inspection within 45 days of STI's receipt of the independent laboratory's inspection report, and those reports shall be made available to members of the public.
- f. STI shall also send a copy of the Special Inspection reports to each of the Neighborhood Representatives.

5. Enforcement:

- a. Technical compliance with conditions regarding structural inspection shall be monitored and enforced by the Department of Building Inspection. The Planning Department shall enforce these conditions only at the recommendation of the Director of the Department of Building Inspection.
- b. STI shall provide to the Planning Department a complete set of all building permit application materials required by the Department of Building Inspection, including but not limited to: scaled drawings, elevations, site plans, engineering or structural analyses, and photographs.

B. RADIO-FREQUENCY (RF) LEVEL

1. FCC Emission Compliance: It shall be a continuing condition of this permit that the subject antennas be operated in such a manner so as not to contribute to ambient RF emissions in excess of the then-current FCC emission standards for public exposure. Violation of this condition shall be grounds for revocation.

2. Publicly-Accessible Property:

- a. Consistent with the agreement between STI and the Planning Commission at its February 26, 1998, hearing on DTV antenna installation, STI shall measure RF public exposure levels at 200 publicly-accessible sites within 1000 feet of the Tower. Measurements shall be made each three years, or within two weeks of the activation of any DTV broadcasting antenna, or within two weeks of any increase in power from any main DTV antenna's initial power level, whichever is earliest.
- b. At least two weeks before performing the aforementioned RF exposure measurements at publicly accessible sites, STI shall notify the Department of Public Health and the Neighborhood Representatives of its intent to perform such RF exposure measurements and seek to arrive at a mutually agreeable weekday date, during normal business hours, to take the RF exposure measurements; provided, however if the participating parties cannot agree on a mutually agreeable date despite good faith efforts, or no response to the offered date is received, STI may set a date on two weeks' notice. A representative of the Department of Public Health and up to two community observers identified by the Neighborhood Representatives may observe the measurement session

and recommend sites for measurement.

- c. Upon approval from any affected public or private property owner, STI shall immediately remedy any ambient or localized field found by these measurements to exceed the FCC standard for RF exposure and then take new measurements in accordance with the procedure in subsection b. above to demonstrate compliance with the standard.
- d. A report of any RF exposure measurements required herein shall be submitted to the Planning Department, the Department of Public Health and to the Neighborhood Representatives within two weeks after STI's receipt of the consultant's report, and such reports shall be made available to members of the public and posted on the STI web site.
- e. STI shall also send a copy of each RF exposure report to each of the Neighborhood Representatives.

3. Private Property:

- a. Upon request to STI from an individual property owner within 1000 feet of the Tower, STI shall measure RF exposure levels indoors and/or outdoors of the home as requested by the owner. If the measured RF levels fall within the applicable FCC standard for RF exposure, then no additional measurement requests shall be accepted unless any television broadcast antenna is replaced or relocated or power of any television broadcast antenna is increased or three years have elapsed whichever is sooner. Measurement requests can be made verbally or in written form as described on the STI web site. An appropriate approval document will be required prior to measurements being taken.
- b. With the cooperation and approval of the property owner, STI shall immediately remedy any ambient or localized field found by these measurements to exceed the FCC standard and then take new measurements to confirm compliance with the standard.
- c. With the written approval of the owner of the private property requesting the RF exposure level measurements, STI shall submit a report to the Planning Department and to the Department of Public Health within 45 days after STI's receipt of the consultant's report, and such report shall be made available to members of the public.

4. Enforcement:

- a. Technical compliance with conditions pertaining to RF exposure shall be monitored and enforced by the Department of Public Health. The Planning Department shall enforce these conditions only at the recommendation of the Director of the Department of Public Health.

C. NEIGHBORHOOD COMMUNICATION

1. **Notice:** Within ten days of submitting any report required herein to any public agency, STI shall send notice a copy report to the neighborhood representatives.

- 2. Community Liaison:** STI shall appoint a community liaison to respond to neighborhood inquiries and concerns. STI shall invite the Twin Peaks Improvement Association, Forest Knolls Neighborhood Association and the Midtown Terrace Homeowners Association to appoint one community liaison each (the "Neighborhood Representatives") with whom STI is to communicate regarding Sutro Tower operations.

D. PRESERVATION CONDITIONS OF APPROVAL

The following are Conditions of Approval related to the permanent removal of the vertical cladding on Sutro Tower:

Within sixty days of project approval, STI will submit to the Planning Department an outline for compliance with the Preservation Conditions of Approval along with a timeline for execution of the condition milestones required after the project approval.

STI and the Planning Department acknowledge that STI's ability to comply with the timeframes and deadlines set forth in these Preservation Conditions of Approval (any, "a Deadline") may, in certain circumstances, be dependent upon approval and cooperation of third parties which are outside the control of STI and/or the Planning Department. Notwithstanding any such Deadlines, provided STI uses good faith efforts in its attempts to meet such Deadlines, any Deadline may be extended by the Zoning Administrator to the extent third party approval is not timely obtained. Any such request for or extension of a Deadline shall not have any impact on any other pending or future permit application of STI, so long as such extension is requested in a timely fashion.

- 1. Interpretive Installation:** STI will develop an interpretive program that will include interpretive panels describing the history and significance of Sutro Tower (the "Panels"), as more fully described below. STI is encouraged to include an artistic component in this installation, and is further encouraged to feature at least a portion of one or more of the salvaged panels in the installation of the Panels. Good faith efforts shall be made by STI to secure a location for the Panels that is acceptable to the three local "Neighborhood Associations" (collectively, Midtown Terrace Home Owners Association, Twin Peaks Improvement Association and Forest Knolls Neighborhood Organization) through their designated liaisons to STI (each, an "Association Liaison"). The Panels shall be located at a location other than the Sutro Tower facility with a direct view of Sutro Tower, where they will be visible to a greater number of passerby than were they to be located at the Sutro Tower facility. The Planning Department shall make good faith efforts to collaborate with STI regarding site selection. All required regulatory approvals to install the Panels shall be sought within 12 months of project approval, and installation shall commence within 18 months of project approval. The size of the installation shall be commensurate with the location at which it will be installed, with an anticipated limitation of approximately 10' x 6' x 2' or 120 cubic feet.

The interpretive program shall be focused on the history of the project site, its identified historic resources, and its significant historic context, including, but not limited to, the history of Sutro Tower, the history of over-the-air broadcasting within the San Francisco Bay Area, or Sutro Tower as a cultural and aesthetic icon (individually, or collectively, the "Historic Element"), and specifically identifying neighborhood concerns about the safety and impacts of Sutro Tower's operations and the neighborhood's related contributions to making the tower safer and less intrusive operationally (the "Historic Neighborhood Element"). The

interpretive program should be developed and implemented in the form of interpretative panels by a qualified design professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, as well as a professionally qualified historian or architectural historian, or community group approved by the Planning Department, with input from the Association Liaisons. Solicitation for such input from the Association Liaisons shall be solicited in commercially reasonable timeframes to allow for sufficient review and revisions. For purposes of this input and timeframes, the Association Liaisons have acknowledged the importance of providing their historic documents to STI for incorporation and preservation. For purposes of this condition, any firm identified on the Planning Department's Historic Resource Consultant Pool list shall be deemed approved as a professional qualified historian. Interpretive panels shall be made of high-quality, durable, all-weather materials. Additionally, materials created as part of other Conditions of Approval could be referenced and/or accessed via the interpretation (such as through a QR code). STI will submit documentation to the Planning Department that the installation is fully installed within two years of project approval and make good faith efforts to complete earlier.

The installation proposal and schedule shall be detailed in the Public Interpretation Installation Plan submitted by STI and approved in the commercially reasonable discretion of 1) the Association Liaisons relative to the Historic Neighborhood Element (for purposes of which the Association Liaisons have acknowledged the importance of providing their historic documents to STI for incorporation and preservation) and 2) the Planning Department to ensure the plan contains the foregoing parameters to implement a publicly viewable historically accurate and educational interpretation program. The plan shall include the general parameters of the installation including the proposed location(s), an outline of the proposed content of the interpretative program, and an estimated schedule of finalizing the content, design, installation, and maintenance plan of the public interpretation Panels.

In consultation with the Planning Department, STI shall develop a temporary art or interpretive display ("Temporary Display") celebrating the Historic Element and/or the Historic Neighborhood Element which could include plans, models, drawings and other artifacts or art related to Sutro Tower (the content of which will be up to the artist or the retained consultant, as applicable). STI is encouraged to invite local schools to participate. STI will submit documentation to the Planning Department that the Temporary Display occurs or is opened, as applicable, within 18 months of project approval and make good faith efforts to complete earlier. The Temporary Display will preferably be located on or adjacent to the Sutro Tower site, but may also be located nearby so long as that location affords a prominent view of the tower.

- 2. Documentation:** : In coordination with the Planning Department, STI will prepare two types of digital documentation of Sutro Tower to be made available to the public. The first type of documentation shall be video documentation of Sutro Tower. This video documentation may be provided in multiple parts, but which in total shall include a narrative of the site history and significance of Sutro Tower, including the Historic Neighborhood Element, and a virtual tour of the Sutro Tower site (the "Virtual Tour," see also Condition 4: Sutro Tower Virtual Tour/Open House); provided, however, all footage used in any such video documentation shall be in STI's discretion to protect the security of Sutro Tower and its operations. If possible, the video should incorporate documentation of the artists and artist installations that will be created as part of Condition 1: Interpretive Installation. Video documentation shall be conducted by a professional videographer or production studio with experience recording architectural resources and/or otherwise documenting historic content and stories, potentially including one or more of the broadcasters which lease

space on Sutro Tower (any, a “professional videographer”). Within six months of project approval, the professional videographer shall provide a storyboard of the proposed video recordation for review and approval by the Association Liaisons relative to the Historic Neighborhood Element and the Planning Department, such approval not to be unreasonably withheld, along with proposed plan of public distribution. The Planning Department’s preservation staff and the Association Liaisons, as applicable, shall notify STI of its approval or disapproval of the storyboard and any disapproval shall state in reasonable detail the reasons for objection, after which STI shall submit a revised storyboard incorporating such comments or rationale for non-inclusion. The above approval, comment and revision process shall be repeated until approved (a “Review Process”). STI will provide the Planning Department with a copy of the video documentation project and documentation that the public distribution plan has been implemented within 1.5 years of project approval.

The format of the second type of digital recordation is the creation of a repository for photographs of Sutro Tower which will be available to the public to download for free for creative or artistic purposes. Subject to STI’s discretion to protect the security of Sutro Tower and its operations, STI shall digitize its collection of historic photos and historic drawings and plans of the tower, as well as solicit those of third parties for inclusion. Within six months of project approval, STI will submit a plan for the repository creation for review and approval by the Planning Department, such approval not to be unreasonably withheld, which plan shall include the proposed process for photography review and collection and the proposed plan for public distribution which, at a minimum, shall include availability through STI’s website. STI and the Planning Department shall undergo a Review Process until the plan for the repository creation has been approved. STI will provide a copy of the contents of the digital repository to the Planning Department and documentation that the public distribution plan is in place within two years of project approval.

- 3. Sutro Tower Virtual Tour/Open House:** STI shall create a program utilizing the Virtual Tour to allow the public to learn about the history and importance of the facility. STI shall engage with SF City Guides, another local tour guide group or association, or with a group, association, or consultant with experience with creation of Virtual Tours for historical resources, as approved by the Department in its commercially reasonable discretion (any, a “Guide”), to develop content for the Virtual Tour which may be included on the SF City Guides website at such organization’s option and/or other local community, historical or educational group websites and on STI’s website. Once a tour guide group has been identified, STI shall engage a qualified architectural historian meeting the qualifications set forth in the Secretary of the Interior’s Professional Qualification Standards to work with STI and selected tour guide group to develop content for the Virtual Tour. For purposes of this condition, any firm identified on the Department’s Historic Resource Consultant Pool list shall be deemed approved as a qualified architectural historian meeting such standards. Virtual Tour content shall use information found in the Historic Resource Evaluations and the Planning Department response (preservation team review form) prepared for the project, along with other available background information on the resource. Other existing information, including photographs, news articles, oral histories, memorabilia and video, may be used to develop information for the Virtual Tour as meaningful.

The qualified architectural historian and scope of work for the Virtual Tour must be reviewed by the Planning Department’s preservation staff. Within six months of project approval STI will submit the final Virtual Tour scope (to correspond with certain deliverables required for Condition D(2): Documentation). The Planning Department’s preservation staff will review and approve final content of the Virtual Tour, which shall not be

unreasonably withheld. STI and the Planning Department shall undergo a Review Process until the Virtual Tour has been approved.

STI will annually report to the Planning Department on various content performance metrics such as impressions, as reported to STI by any Guides, as well as measured on STI's website.

- 4. One-Time Roadway Improvement.** To ensure continued access to the essential infrastructure located on Sutro Tower, it shall be the exclusive responsibility of STI to make a one-time improvement to the roadway leading to Sutro Tower so that it is consistent with the minimum requirements of the Standard Specifications of San Francisco Public Works (SFPW). The roadway in question includes the entire paved roadway area extending from the eastern extent of the intersection of Dellbrook Avenue and LaAvanzada/ Palo Alto Avenue extending to the security gate at the Sutro Tower site, and includes some or all of Dellbrook Avenue, Palo Alto Avenue, and La Avanzada Street. Roadway repair and replacement would consist primarily of work within the existing public right-of-way and is not expected to include excavation or vegetation removal. Prior to the issuance of a Building Permit for the Vertical Cladding Elimination by the Department of Building Inspection (DBI), STI shall submit a Street Improvement Permit to SFPW. Within six (6) months of the issuance of a Building Permit for the Vertical Cladding Elimination, STI shall commence the roadway improvements in question. Within one (1) year of the issuance of a Building Permit for the Vertical Cladding Elimination, STI shall complete improvements to the roadway.
- 5. Student Engagement.** STI shall enlist an artist to produce a work of art inspired by Sutro Tower which can be shown to the students at Clarendon Elementary School within 18 months of project approval. The content and scope of this artwork shall be up to the artist. The video documentation and Virtual Tour, described in Conditions D(2) and D(3), respectively, shall also be made available to these students to educate them about the history and architecture of Sutro Tower, as well as the technology of modern communications.

APPEAL AND EFFECTIVE DATE OF ACTION: Any aggrieved person may appeal this Building Permit Application to the Board of Appeals only after the Department of Building Inspection (DBI) takes action (issuing or disapproving) the permit. Such appeal must be made within fifteen (15) days of DBI's action on the permit. For further information, please contact the Board of Appeals at (628) 652-1150, 49 South Van Ness Ave, Suite 1475, San Francisco, CA 94103.

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 did take Discretionary Review and approved the building permit as reference in this action memo on May 25, 2023.



Jonas P. Ionin
Commission Secretary

AYES: Braun, Imperial, Diamond, Koppel, Moore, Tanner

NOES: None

ABSENT: Ruiz

ADOPTED: May 25, 2023

SUTRO TOWER

1 LA AVANZADA STREET

SAN FRANCISCO, CALIFORNIA

CLADDING REMOVAL

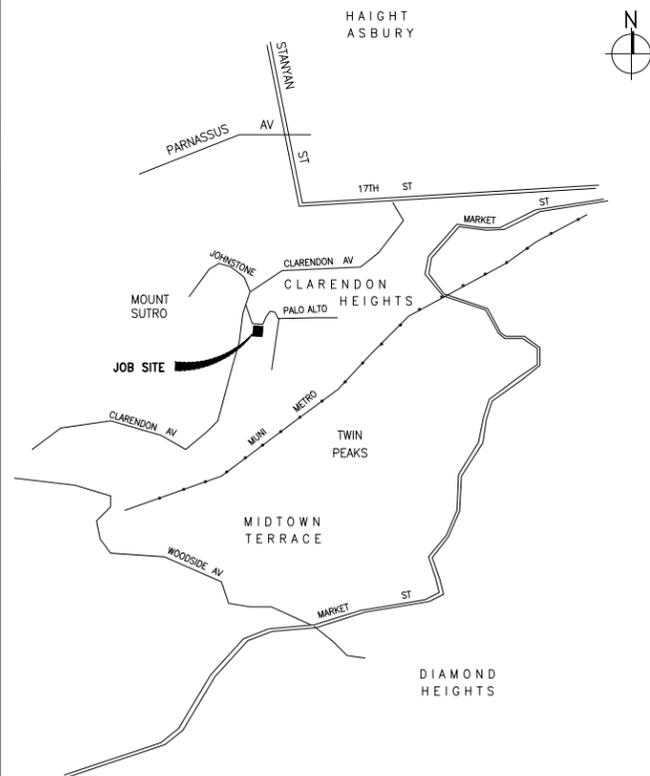
SIMPSON GUMPERTZ & HEGER
 Engineering of Structures
 and Building Enclosures

Simpson Gumpertz & Heger Inc.
 100 Pine Street, Suite 1600
 San Francisco, California 94111
 Phone: 415.493.3700 Fax: 415.493.3550
 www.sgh.com

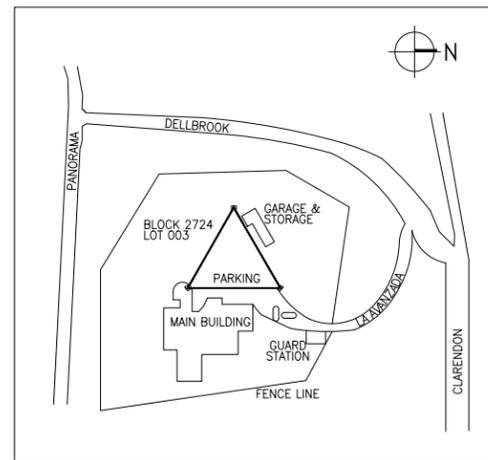
Boston
 Chicago
 Los Angeles
 New York
 San Francisco
 Washington, DC

Consultant

VICINITY MAP



SITE MAP



LIST OF DRAWINGS

- S0.0 TITLE SHEET, VICINITY MAP & LIST OF DRAWINGS
- S0.1 GENERAL NOTES AND ABBREVIATIONS
- S1.0 TOWER REFERENCE PLAN, ELEVATION, & SECTIONS

SCOPE OF WORK

- REMOVE ALL CLADDING ON LEG B
- REMOVE CLADDING ON LEGS A AND C FROM 30 FEET ABOVE BASE - PAINT TOWER LEGS, HORIZONTAL, THE VERTICAL FACES OF HORIZONTAL LEVELS 2, 3 AND 4, AND ALL OF LEVELS 5 AND 6 IN AVIATION ORANGE AND WHITE

No.	Date	Description	By
4/11/2023		PERMIT SUBMITTAL	ROH

SUTRO TOWER
CLADDING REMOVAL
 1 LA AVANZADA ST.
 SAN FRANCISCO
 CALIFORNIA

Project

TITLE SHEET
VICINITY MAP
&
LIST OF DRAWINGS

Drawing Title

Commission 067199.22	Checked Approved	Date 4/11/2023
Drawn GPN	Scale AS NOTED	Drawing No.



S0.0

Seal

COATING APPLICATION

1. Prepare the substrate for coating application with a combination of hand tools and power washing to remove chalk, dirt, surface corrosion, biological contaminants, and poorly bonded coatings, and to provide a roughened surface for new coating adhesion.
2. Spot prime coat: All cleaned to bare-metal surfaces shall receive one spot prime coat of Tnemec Series 118 Uni-Bond Mastic, a rust-inhibitive elastomeric coating, with a minimum solids by volume of 55% and VOC of 31 grams/litre or less, color 30GR (gray) @ 6-7 mils DFT. Overlap a minimum 3" onto surrounding intact existing coatings.
3. Stripe-Coat: All leading edges of cleaned nut & bolt assemblies, weld seams, rivets or similar connection points shall receive a "stripe-coat" of Tnemec Series 118 Uni-Bond Mastic, contrasting color to prime and intermediate coat, applied by brush at 3.0-4.0 mils dft.
4. Full Intermediate Coat: One full coat of Tnemec Series 118 Uni-Bond Mastic in color 1281 (off white) @ 6-7 mils DFT on all exterior surfaces scheduled for coating.
5. Full Finish Coat: One full finish coat of Tnemec Series V1071 Fluoronor, a thermoset fluoropolymer resin finish coat, with a minimum solids by volume of 56% and VOC of 97 grams/litre or less thinned 10%. (color selected by Owner) @ 2.5-3.0 mils DFT per-coat, on all exterior surfaces scheduled for coating.
6. Color shall be oviation orange and white to match existing vertical striping pattern.
7. Submit color samples to Owner prior to painting.
8. Approved Carboline product may be substituted for Tnemec products specified.

GENERAL

1. General notes and typical details apply to all structural features, unless otherwise indicated.
2. If certain features are not fully shown or called out on the drawings or in the specifications, their construction shall be of the same character as for similar conditions.
3. Dimensions shall not be scaled off of the drawings.
4. All work shall conform to minimum standards of the 2016 California Building Code, of any codes listed in the drawings or specifications and of any regulating agencies which have authority over any portion of the work, including the State of California Division of Industrial Safety.
5. Openings, pockets, etc. shall not be placed in structural members unless specifically detailed on the structural drawings. Notify the structural engineer when work requires openings, pockets, etc. in structural members not shown on the structural drawings.
6. The contractor shall be responsible for coordinating the work of all trades and shall check all dimensions and holes and openings required in structural members. All discrepancies shall be called to the attention of the structural engineer and shall be resolved before proceeding with the work.
7. The contract documents represent the finished structure. They do not indicate the method of construction. The contractor shall provide all measures necessary to protect life and property during construction. Such measures shall include, but are not limited to, bracing and shoring for loads due to construction equipment and materials. Observation visits to the site by the structural engineer shall not include inspection of the above items.
8. Construction materials shall be spread out if placed on framed floors or roofs. Load shall not exceed the design live load per square foot. Provide adequate shoring where overload is anticipated.
9. The contractor shall use extreme caution to protect all conduits, pipes, ducts, architectural finishes and utilities not indicated as being removed from damage during construction and shall restore all damaged or otherwise affected elements to their preconstruction condition, unless otherwise noted.
10. The Sutro Tower transmission facilities must remain in operation at all times during the construction period. Contractor shall submit a written work plan indicating the proposed sequence and schedule of work and specific operations to be conducted, to Sutro Tower for review, prior to performing any work on site. The work plan shall be revised and resubmitted on a weekly basis to alert Sutro Tower as to the progress of work accomplished to date and current schedule for performing additional work.
11. Sutro Tower is a radio transmission facility and emits high energy radio waves. The contractor shall be responsible for determining and implementing appropriate protective measures for personnel working on site.
12. The contractor shall maintain a fire watch and employ necessary protective measures when welding or thermally cutting near flammable materials.
13. The removal, cutting, drilling, etc. of existing work shall be performed with care in order not to jeopardize the structural integrity of the structure. If structural members or mechanical, electrical or architectural features not indicated for removal interferes with the new work, the Engineer shall be notified immediately and prior approval shall be obtained before removal of members.
14. The contractor shall promptly repair any damage caused during operations, using materials and workmanship similar to that which was damaged.
15. All removed items, materials and debris, unless otherwise noted, shall be removed promptly from the site and disposed of in a legal manner.

DEMOLITION

1. Prior to performing demolition, submit a demolition plan, sealed by a California-licensed civil or structural engineer indicating sequence of work to be performed, anticipated schedule, necessary rigging equipment and means of attachment to the tower, methods of removal and lowering existing materials to be demolished, and removing them from the site.
2. Provide temporary support for all utilities and appurtenances that must be loosened, to permit removal of existing siding. Reattach utilities and appurtenances in same manner as installed prior to siding removal. If conditions do not permit this, notify structural engineer.

SPECIAL INSPECTIONS AND STRUCTURAL OBSERVATION

1. Special inspection is not required.

ABBREVIATIONS

&	And	JST.	Joist
@	At		
A.B.	Anchor bolt	K	Kips
ADD'L	Additional	KSI	Kips per Square Inch
AISC	American Institute of Steel Construction	LBS.	Pounds
ALT.	Alternate	LL	Live Load
ARCH.	Architect	L.L.H.	Long Leg Horizontal
ASD	Allowable Strength Design	L.L.V.	Long Leg Vertical
ASTM	American Society for Testing and Materials	LWT	Lightweight
A.W.P.A.	American Wood Preservers Assoc.	L.V.L.	Laminated Veneer Lumber
AWS	American Welding Society	MAX.	Maximum
BLKG.	Blocking	M.B.	Machine Bolt
BM.	Beam	MECH.	Mechanical
B.N.	Boundary Nail	MFR.	Manufacturer
BOCA	Building Officials and Code Administrators International, Inc.	M.I.	Malleable Iron
		ML	Millimeter
		MIN.	Minimum
		MISC.	Miscellaneous
BOTT.	Bottom		
BRG.	Bearing	(N)	New
B.S.	Both Sides	NO. #	Number
BTWN.	Between	N.S.	Near Side
		N.T.S.	Not to Scale
		NWT	Normalweight
CBC	California Building Code		
C.C.	Center to Center		
CCR	California Code of Regulations	O.C.	On Center
		O.D.	Outside Diameter
C.J.	Control Joint	O.H.	Opposite Hand
C.I.P.	Cast-in-place	OPNG.	Opening
C.L.C.	Center Line	OPP.	Opposite
CLG.	Ceiling	OSHPD	Office of Statewide Health Planning and Development
CLR.	Clear		
CMU	Concrete Masonry Unit		
COL.	Column		
CONC.	Concrete	P.A.F.	Powder-Actuated Fasteners
CONN.	Connection		
CONT.	Continuous	PART.	Partial
C.P.	Complete Penetration	PCF	Pounds per Cubic Foot
CSK	Countersink	PL_R	Plate
CTBR.	Counterbore	PLY.	Plywood
CTR.	Center	P.P.	Partial Penetration
		PSF	Pounds per Square Foot
DBA	Deformed Bar Anchor	PSI	Pounds per Square Inch
DBL	Double	PWJ	Plywood Web Joists
DC	Demand Critical (Weld)		
DET.	Detail	RAD.	Radius
DF	Douglas Fir	R.D.	Roof Drain
DIA.Ø	Diameter	REINF.	Reinforcing
DIAG.	Diagonal	REQ.	Required
DL	Dead Load	RF.	Roof
DN	Down	R.O.	Rough Opening
DO	Ditto	RND.	Round
DSA	Division of the State Architect	R.R.	Remove & Replace
DWG(S).	Drawing(s)	S.A.D.	See Architectural Drawings
(E)	Existing	SCHED.	Schedule
EA.	Each	SFRS	Seismic Force-Resisting System
E.F.	Each Face	SHT.	Sheet
E.J.	Expansion Joint	SHTG.	Sheathing
ELEV., EL.	Elevation	SIM.	Similar
EMB., EMBED.	Embedment	S.M.D.	See Mechanical Drawings
E.N.	Edge Nail	S.O.G.	Slab on Grade
EQ.	Equal	S.P.	Southern Pine
EQUIP.	Equipment	SSTL	Stainless Steel
E.W.	Each Way	STAGG'D.	Staggered
		STD.	Standard
FDN.	Foundation	STIFF.	Stiffener
F.F.	Finish Floor	STL.	Steel
F.G.	Finish Grade	STRUCT.	Structural
FIN.	Finish	SYMM., SYM	Symmetrical
F.O.C.	Face of Concrete		
F.O.M.	Face of Masonry	T&B	Top and Bottom
F.O.S.	Face of Stud	T&G	Tongue & Groove
FRMG.	Framing	T.N.	Toe Nail
F.S.	Far Side	T.O.C.	Top of Concrete
FTG.	Footing	T.O.S.	Top of Steel
		T.O.W.	Top of Wall
GA.	Gage	TS	Tube Steel
GALV.	Galvanized	TYP.	Typical
G.L.	Grid Line		
GLB	Glue-Laminated Beam	UBC	Uniform Building Code
GR.	Grade	U.O.N.	Unless Otherwise Noted
HDG.	Hot-dip Galvanized	VERT.	Vertical
HGR.	Hanger	V.I.F., ±	Verify in Field
HK.	Hook		
HORIZ.	Horizontal	W/	With
H.S.B.	High Strength Bolt	W/O	Without
HSS	High Strength Structural Sections	WCLB	West Coast Lumber Inspection Bureau
HT.	Height	W.P.	Working Point
		W.H.S.	Welded Headed Stud
ICBO	International Council of Building Officials	W.T.S.	Welded Threaded Stud
ICC	International Code Council	W.W.F.	Welded Wire Fabric
INT.	Interior	WWPA	Western Wood Products Association
INV.	Inverted		

GENERAL SYMBOLS AND LEGEND

	REVISION
	GRIDLINE INDICATING CENTERLINE OF CONCRETE OR PLYWOOD SHEAR WALL
	TYPICAL GRIDLINE INDICATING FACE OF CONCRETE WALL
	BUILDING SECTION OR ELEVATION
	WORK POINT, DATUM OR CONTROL POINT, FIN. FLR. ELEVATION, S.A.D.
	DETAIL REFERENCE
	PROJECT NORTH, S.A.D. FOR TRUE NORTH

SIMPSON GUMPERTZ & HEGER
 Engineering of Structures and Building Enclosures
 Simpson Gumpertz & Heger Inc.
 100 Pine Street, Suite 1600
 San Francisco, California 94111
 Phone: 415.493.3700 Fax: 415.493.3550
 www.sgh.com

Boston
 Chicago
 Los Angeles
 New York
 San Francisco
 Washington, DC

Consultant

No.	Date	Description	By
	4/11/2023	PERMIT SUBMITTAL	ROH

**SUTRO TOWER
 CLADDING REMOVAL
 1 LA AVANZADA ST.
 SAN FRANCISCO
 CALIFORNIA**

GENERAL NOTES & ABBREVIATIONS

Drawing Title

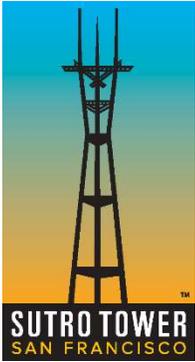
Commission 067199.22	Checked Approved	Date 4/11/2023
Drawn GPN	Scale AS NOTED	Drawing No. S0.1

REGISTERED PROFESSIONAL ENGINEER
 No. 2951
 STATE OF CALIFORNIA
 4/11/2023

S:\Projects\2006\07199.22_Sutro\Drawings\Working_Series\000.dwg, 4/11/2023 12:26:03 PM, GH/haal

Exhibit B

Preservation Conditions of Approval Compliance Outline and Timeline



Sutro Tower, Inc.
1 La Avanzada Street
San Francisco, CA 94131
Phone 415-681-8850 FAX 415-681-6754

MEMORANDUM

TO: San Francisco Planning Department
FROM: Sutro Tower, Inc. (STI)
DATE: July 25, 2023
RE: Preservation Conditions of Approval Compliance Outline/Timeline
- Discretionary Review Action DRA-827
- (Record No. 2019-0108.9873)

This outline for compliance with the Preservation Conditions of Approval along with a timeline for execution of the condition milestones is submitted to the Planning Department to illustrate STI's plan and commitment to satisfying the Preservation Conditions of Approval ("Conditions") approved by the San Francisco Planning Commission on May 25, 2023, as set forth in the Discretionary Review Action DRA-827 ("Discretionary Review Action Memo"). Other than the deadlines to which STI committed in the Conditions, all timelines set forth herein are estimates to which STI will use good faith to work towards. Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Discretionary Review Action Memo.

1. Interpretive Installation

- **Interpretive Installation Plan:** STI has identified a wide array of diverse vendor candidates capable of handling the interpretative installation project. Initially, the selected vendor will review existing resources including both older and recent press and photographs as well as historical materials to incorporate relevant story lines, including both the Historic Element and the Historic Neighborhood Element, into the Panels. Such review may entail utilizing the public library for historic archives on Sutro Tower.
- STI will endeavor in good faith to secure a location for the Panels that is acceptable to the Association Liaisons, which it will achieve by coordinating meetings with the Association Liaisons to gather feedback on proposed plans,

and revising those plans as necessary in collaboration with the Planning Department. STI will rely upon the Association Liaisons timely providing historic documents to STI for incorporation and preservation.

- Ultimately, STI will install architectural graphic Panels with an estimated installation size limitation of 10' x 6' x 2'. These Panels will be designed, engineered, and hardened for public deployment, and will meet San Francisco's accessibility guidelines. STI is moving swiftly to begin this Panel project in order to comply with the deadline of May 25, 2025.

- **Timeline:**

Task	Timeline
Identify types of vendors: <ol style="list-style-type: none"> 1. Artist 2. Fabrication 3. Design professional 4. Architectural historian and/or qualified historian 	Complete
Identify potential vendors and receive initial proposals; identify proposed locations	Complete
Select final vendors	September 1, 2023
Formulate plan for community engagement (including with Association Liaisons)	October 1, 2023
Complete historical research component	December 1, 2023
Submit Public Interpretation Installation Plan (including installation proposal and schedule) to Association Liaisons and Planning Department	January 15, 2024
Develop interpretive signage program	February 25, 2024

Finalize lease or license for use of Panel location	April 25, 2024
Apply for all required regulatory approvals to install Panels	May 25, 2024
Commencement of installation of Panels	September 25, 2024
STI submittal of documentation to the Planning Department that installation is fully installed	March 25, 2025

- **Temporary Display Completed Plan:**
 - The Temporary Display condition has been substantially satisfied. From sundown until midnight on July 4 through July 8, 2023, Sutro Tower was illuminated with a laser light display in celebration of Sutro Tower’s 50th anniversary, which broadcast its first transmissions on July 4th, 1973. The Temporary Display consisted of 12 multi-colored lasers stationed at the base of Sutro Tower, positioned to replicate Sutro Tower’s non-uniform triangular cross-section that tapers inward at Level 4. The display created a vibrant sea of lights visible throughout San Francisco when not obscured by the fog. The colorful installation, named “loveAbove” (with the capital “A” representing Sutro Tower), was created by public arts nonprofit, Illuminate.
 - Additionally, prior to the initial evening of the Illuminate display at Sutro Tower, www.sutrotower.com announced such event as a celebration of Sutro Tower’s 50th anniversary. STI also created a new 50th anniversary landing page on its website to share with the San Francisco community (and the world at large) additional datapoints on Sutro Tower’s history. The content created here will eventually be transferred to www.sutrotower.com/tower-history. STI anticipates that such landing pages, as applicable, will be updated with additional information about Sutro Tower’s history as collected and sorted, as well as about Sutro Tower’s Temporary Display through satisfaction of the Digital Documentation Condition described below.
 - Sutro Tower also issued a press release prior to the date of the Illuminate display with the website link, which additionally incorporated information on the history of Sutro Tower. STI requested that Illuminate promotional materials also contain such link. Sutro Tower and its 50th anniversary celebration received a significant amount of press.
- **Remaining Task Timeline:** STI will provide commemorative information of Sutro Tower’s 50th anniversary and associated Illuminate display to interested teachers at local schools for use in art and writing projects on or before October

1, 2023, with documentation thereafter submitted to the Planning Department that the Temporary Display Condition has been fully satisfied.

2. Digital Documentation

- **Plan:** With regard to the video documentation component of the Conditions, STI plans to use creative technology to implement inspired storytelling utilizing qualified vendors. Presently, the plan includes producing a cinematic-quality production eight to ten minutes in length, which will include narration, musical score (licensed), interviews and archival footage (existing, licensed). As to the online photo repository, STI plans to implement content modeling and provisioning of third-party content management systems. This will include media digitization and metadata entry components. Additionally, the current plan includes a responsive (web/mobile) website that is searchable, accessible, SEO-optimized and which is internationalized to key languages, built using modern and innovative best practices.
- **Timeline:**

Task	Timeline
Identify types of vendors: <ol style="list-style-type: none"> 1. Professional videographer or production studio 2. Photo digitization service 3. Software and systems expert 4. Architectural historian and/or qualified historian 	Complete
Identify potential vendors and receive initial proposals	Complete
Select final vendors	September 1, 2023
Professional videographer submits storyboard of proposed video documentation project to STI for review and approval	October 25, 2023
Storyboard of proposed video documentation project submittal to Association Liaisons and Planning Department for review and	November 25, 2023

approval. Submittal shall include plan for public distribution	
Submittal of proposed plan for digital repository for Planning Department review and approval	November 25, 2023
Planning Department Review Process	November 25, 2023 through February 25, 2024
Public distribution of video documentation commences	October 1, 2024
Copy of video documentation project and documentation that the public distribution plan has been implemented submitted to Planning Department	November 25, 2024
Public distribution of digital repository commences	May 1, 2025
Copy of the contents of digital repository submitted to Planning Department along with proof of documentation of public distribution plan	May 25, 2025

3. Virtual Tour.

- Plan:** With regard to the Virtual Tour, STI plans to create an online annotated tour. STI will leverage latest technologies to deliver an immersive experience on multiple platforms. STI is exploring the option to produce the video in real time, with an explorable 3D model captured via photogrammetry and/or neural radiance fields. STI's vision is to have "visitors" traverse to impossible-to-reach spots on the tower with fluid, cinematic transitions, and multiple points of interest with rich media content. The Virtual Tour would integrate gigapixel panoramic views from key locations on Sutro Tower at different times of the day. In accordance with the approved Conditions, the Virtual Tour would exclude secure and private coordinates of the property and the tower and remains otherwise within STI discretion to maintain a safe and protected operation.

- **Timeline:**

Task	Timeline
Identify types of vendors: <ol style="list-style-type: none"> 1. Guide 2. Architectural historian 3. Potentially a professional videographer 	Complete
Identify potential vendors and receive initial proposals	August 15, 2023
Identify Guide for Planning Department approval	September 1, 2023
Planning Department approves Guide	September 15, 2023
Identity of qualified architectural historian submitted to Planning Department for review	October 1, 2023
Planning Department approves qualified architectural historian	October 15, 2023
Final Virtual Tour scope submitted to the Planning Department for review and approval (to correspond with certain deliverables required for Digital Documentation Condition)	November 25, 2023
Planning Department Review Process	November 25, 2023 through February 25, 2024
Virtual Tour complete	November 25, 2024
STI will annually report to the Planning Department on various content performance metrics	Annually each May commencing May 25, 2025.

4. One-Time Roadway Improvement.

- **Completed Plan:** STI satisfied the Condition of a one-time roadway improvement consistent with the minimum requirements of the Standard Specifications of San Francisco Public Works by the completion of the scope of work described in General Excavation Permit 23E-00470, dated June 14, 2023. Such roadwork was completed on June 23, 2023.

5. Student Engagement.

- **Plan:** STI has identified a wide array of diverse artists capable of producing a work of art inspired by Sutro Tower. In addition, the Virtual Tour and digital documentation components described above will be made available to the students at Clarendon Elementary School.
- **Timeline:**

Task	Timeline
Identify potential artists and receive initial proposals	Complete
Select artist	October 1, 2023
Completion of artwork	April 1, 2024
Presentation of artwork to Clarendon students	May 25, 2024
Virtual Tour complete and provided to students at Clarendon Elementary School	November 25, 2024
Video documentation project completed and provided to Clarendon students	November 25, 2024