

MEMORANDUM

January 10, 2020

TO: MEMBERS, PORT COMMISSION
Hon. Kimberly Brandon, President
Hon. Willie Adams, Vice President
Hon. Gail Gilman
Hon. Victor Makras
Hon. Doreen Woo Ho

FROM: Elaine Forbes
Executive Director

SUBJECT: Request approval of a Trust Exchange Agreement with the California State Lands Commission that would remove the public trust from certain Transbay Streets and impress the public trust on certain Fisherman's Wharf Streets; adopting environmental findings and findings of consistency with the General Plan and the eight Priority Policies of City Planning Code Section 101.1; and authorizing the Port's Executive Director to execute documents, make certain modifications and take certain actions in furtherance of this Resolution.

DIRECTOR'S RECOMMENDATION: Approve Attached Resolution No. 20-01

SUMMARY

The purpose of the memorandum is to provide the Port Commission and the public with information and analysis regarding Port staff's recommendation to approve the trust exchange between the Port, City, and the State Lands Commission for Transbay and Fisherman's Wharf streets. Staff recommends approval of a trust exchange to facilitate consolidation of the Transbay Transit Center site and implementation of a plan to strengthen the substructure of the Millennium Tower residential development at 301 Mission Street.

The new Transbay Transit Center encroaches in part in the airspace over Fremont and Beale Streets. The City seeks to acquire from the Port the air and subsurface rights in

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the streets occupied by the Transit Center structure and trainbox, including the occupied portions of Fremont and Beale Streets, for the purpose of creating a single legal parcel for the entire Transit Center site. The City also seeks to convey a permanent easement in the surface and subsurface of a portion of Mission Street in addition to portions of Beale and Fremont Streets to permit the construction and maintenance of a retrofit for the Millennium Tower residential development at 301 Mission Street.

Those portions of Mission Street, Fremont Street and Beale Street in the vicinity of the Transit Center are among the former State-owned tide and submerged lands granted to the City and County of San Francisco by the State in trust under the Burton Act. The Burton Act prohibits the City from conveying a permanent interest in the granted lands. Accordingly, for the City to convey permanent air and subsurface rights in the Mission, Fremont and Beale Streets, the public trust and Burton Act restrictions must be lifted from portions of these streets with the approval of the State Lands Commission.

The City is requesting the Port Commission approve the exchange. If approved, the exchange agreement would be considered by the Board of Supervisors.

BACKGROUND

In 2001, the Transbay Joint Powers Authority (TJPA) was formed as a joint powers agency consisting of the City, AC Transit, and the Peninsula Corridor Joint Powers Board (Caltrain) for the purpose of constructing a new Transbay Transit Center. In 2002, the California State Legislature added Section 5027.1 to the Public Resources Code, authorizing the construction of a replacement of the old transit terminal at the same location to serve Caltrain, bus lines, and high-speed rail.

Caltrans conveyed the former terminal property to the TJPA in 2010. That conveyance, however, did not include any air or subsurface rights in any streets. In 2011, the Board of Supervisors approved an ordinance vacating the public street easement in the airspace and subsurface of streets occupied by the new Transbay Transit Center, and authorized the City to quitclaim its interest in those areas to the TJPA (Ordinance No. 43-11). With the completion of the Transit Center in 2018 and a legal description defining the area occupied by the Transit Center, the City and the TJPA are finally prepared to proceed with the conveyance of the easements. This has raised the issue of whether the City has the legal authority to convey its interests in Fremont, Mission and Beale Streets to the TJPA and the proponents of Millennium Tower Association.

A proposed structural upgrade for the Millennium Tower at 301 Mission Street, if approved, may occupy a portion of the surface and subsurface of the same streets that are under the Transit Center and adjacent to the Tower, and the City may wish to convey a permanent easement in the occupied areas to the owners of the Tower to provide for the installation of and occupation related to the structural upgrade.

Burton Act

The new Transbay Transit Center encroaches in part in the airspace over Fremont and Beale Streets. The Transbay Transit Center is built on what was once Yerba Buena Cove. When California became a state in 1850, it took title to all the tide and submerged lands in the State – including Yerba Buena Cove. The TJPA seeks to acquire from the City the air and subsurface rights in the streets occupied by the Transit Center structure and trainbox, including the occupied portions of Fremont and Beale Streets, for the purpose of creating a single legal parcel for the entire Transit Center site. The City also seeks to convey a permanent easement in the surface and subsurface of a portion of Mission Street in addition to portions of Beale and Fremont Streets to the neighboring property “owner” Millennium Tower Association to permit the construction and maintenance of a retrofit for the tower foundation to prevent and potentially correct the subsidence and leaning of the Millennium Tower.

Those portions of Mission Street, Fremont Street and Beale Street in the vicinity of the Transit Center are among the former State owned tide and submerged lands granted to the City and County of San Francisco in trust under Chapter 1333 of the Statutes of 1968 (“Burton Act”). Staff concludes that these streets are impressed with the Public Trust because of the original formation of the shoreline and Yerba Buena Cove.

The Burton Act prohibits the City from conveying a permanent interest in the granted lands; at most it could convey a 66-year lease or easement. Accordingly, for the City to convey permanent air and subsurface rights in the Mission, Fremont and Beale Streets, the public trust and Burton Act restrictions must be lifted from portions of these streets.

Public Trust Exchange

The State Lands Commission (“State Lands Commission”) has authority to approve the public trust exchanges of Port property (the (“**Trust Exchange**”) pursuant to Section 5 of Chapter 310, Statutes of 1987 (“**Chapter 310**”). Under Chapter 310, the City has the authority, subject to State Lands Commission approval, to exchange City property subject to the Public Trust with public or private entities for property not subject to the Public Trust if the City and State Lands Commission make certain findings. The findings are further discussed in the “Public Trust Analysis” section below.

Public Trust Analysis

As mentioned above, the Project must include a proposed Trust Exchange for portions of Beale, Fremont and Mission Streets that provides significant benefits to the Public Trust. Under Chapter 310, the City has the authority, subject to State Lands Commission approval, to exchange City property subject to the Public Trust with public or private entities for property not subject to the Public Trust if the City and State Lands Commission determine that the land to be exchanged out of the Public Trust (1) has been filled and reclaimed; (2) is cut off from access to the waters of the Bay; (3) represents a relatively small portion of the granted tide and submerged lands; (4) is

no longer needed or required for the promotion of the Trust; and (5) can be removed from the Public Trust without causing any substantial interference with Public Trust uses and purposes. In addition, the Trust Addition Streets must have value equal to or greater than the value of the Trust Termination Streets that is useful for the particular trust purposes authorized by the Burton Act.

1. *The Trust Termination Streets have been filled and reclaimed. The Trust Termination Streets are located in the Transbay Area, which was filled as part of the Port's program of reclaiming lands between the new seawall and the previously existing City front, for the purpose of generating revenues used to support the improvement of the harbor.*
2. *The Trust Termination streets are cut off from access to the waters of the Bay. All of the Trust Termination Streets are located on filled land, located on the landside of the 100 foot wide Embarcadero Roadway, which consists of 6 traffic lanes and the MUNI light-rail corridor. No immediate access to the waters of San Francisco Bay exists from any portion of the Trust Termination Streets.*
3. *The Trust Termination Streets are a very small portion of the Port's trust grant. The total area of the Trust Termination Streets is approximately 143,000 square feet (approximately 3.28 acre). The total amount of granted tide and submerged lands held by the Port is approximately 725 acres, of which the Trust Terminal Parcel represents 0.45%.*
4. *The Trust Termination Streets are no longer needed or required for the promotion of the Public Trust. The Streets comprising the Trust Termination Streets are physically cut-off from the water, serve no purpose in furthering maritime commerce, navigation or fisheries, and are no longer needed or required for the promotion of the Trust. As public streets, the Trust Termination Streets do not allow for the feasible development of uses that would further Trust goals such as useable or desirable open space or park use of Trust-consistent commercial use, such as hotel or retail. The primary use of the Trust Termination Streets is public access, but the streets are distant from the waterfront and are not required to provide access to the water.*
5. *The Trust Termination Streets can be removed from the Trust without causing substantial interference with Trust uses and purposes. The use of Trust Termination Streets for non-Trust purposes would not impede any Trust use on the granted lands or otherwise interfere with any Trust purpose. In addition, in exchange for the lifting of the Trust from the Trust Termination Streets, the Port will receive streets into the Trust that have a greater square footage and linear footage than the Trust Termination Streets, and have substantial utility to the Trust.*

The Trust Addition Streets consist of a portion of Beach Street between Van Ness Avenue and Leavenworth Street, a portion of Hyde Street between Beach Street and Jefferson Street, and a portion of Bay Street between Stockton Street and Kearny Street. These streets, located near Fisherman's Wharf area, provide public access along and to the water and the City's waterfront and service important Trust purposes.

- 1. The Beach Street segment of the Trust Addition Streets runs along Aquatic Park, generally parallel to the beach, and provides views of the beach and the San Francisco Bay. A fragment of Beach Street (near Polk Street) is waterward of the historic shoreline and is already in the Trust. The Beach Street segment is also lined with historic waterfront buildings such as the Cannery and Ghirardelli Square, waterfront hotels, and the Maritime Museum. The remainder of Beach Street, from Leavenworth Street to The Embarcadero, is already in the Trust.*
- 2. The Hyde Street segment runs from Beach Street to the waterfront, providing public access to Aquatic Park, the Dolphin Swim and Boat Club, the South End Rowing Club, and the historic Hyde Street Pier ships at the San Francisco Maritime National Historical Park.*
- 3. The Bay Street segment is two blocks south of Pier 39 and one block west of Alcatraz Landing at Pier 33 and the Port's secondary cruise terminal at Pier 35. The street segments abutting the Bay Street segment on three sides (Grant Street north from Bay Street to the Embarcadero, Bay Street to Jones Street on the west, and to The Embarcadero on the east) are already in the Trust.*

Attachment A shows the Trust Termination Streets and Attachment B shows the Trust Addition Streets, including their respective square footages. The Trust Addition Streets to be impressed with the Public Trust has a preliminary appraised value at least equal to the value of the Trust Termination Streets to be conveyed out of the Public Trust, confirming the value of the land to be exchanged into the Public Trust equals or exceeds the value of the land to be exchanged out of the Public Trust. The appraiser will complete the analysis for the State Lands Commission. Staff recommends this trust exchange because the Trust Termination Streets of 143,000 square feet is smaller than the proposed Trade-in Lands of 153,000 square feet and these streets are adjacent to Port property.

For reasons set forth above, the Trust Exchange meets the requirements of Chapter 310.

California Environmental Quality Act ("CEQA") Findings

On December 27, 2019, following the required notice and appeal period, the Planning Department published a Final Mitigation Negative Declaration ("FMND") for the 301 Mission Street, Millennium Tower Perimeter Pile Upgrade Project (the "Project"),

including the permanent easement required for the Project. The FMND found that although the Project could have potentially significant impacts on the environment, such impacts will be reduced to less than significant level because Millennium Tower Association (the “Project Sponsor”) will implement all mitigation measures identified in the PMND.

In a letter dated December 27, 2019 (the “General Plan Referral Letter”), the City Planning Department determined that the Trust Exchange is, on balance, consistent with the General Plan and with the Eight Priority Policies of City Planning Code Section 101.1. As part of its determination on the General Plan, the Planning Department reviewed and considered the FMND, including the proposed mitigation monitoring and reporting program, and adopted CEQA Findings and the proposed mitigation monitoring and reporting program (collectively, “CEQA Findings”) as required by State and local law. The Board of Supervisors adopted and incorporated by reference the CEQA Findings; and, in so doing, the Board of Supervisors approved and endorsed the Mitigation Monitoring and Reporting Program for implementation by other City departments. Copies of the General Plan Referral Letter, FMND, CEQA Findings, and the Mitigation Monitoring and Reporting Program are on file with the Secretary of the Port Commission and incorporated herein by reference. The Board of Supervisors found that the actions proposed are within the scope of the Project analyzed in the FMND and subject to the CEQA Findings.

The Board of Supervisors further found that (1) no substantial changes are proposed in the Project and no substantial changes have occurred with respect to the circumstances under which this Project will be undertaken that would cause new significant environmental effects or a substantial increase in the severity of previously identified effects and (2) there is no new information of substantial importance showing that the Project would have any significant effects not discussed in the FMND, that significant effects would be substantially more severe, or that new or different mitigation measures of alternatives would substantially reduce one or more significant effects of the Project. For copies of CEQA documents in the San Francisco Planning Department’s file for CEQA Case including the Draft Environmental Impact Report (“EIR”) and Comments, please see the Planning Department’s Environmental Planning Division website. Copies of these documents are also filed with the Port Commission Secretary (“CEQA Findings”).

Recommendation

The City is eager to complete this transaction to support the Millennium Tower settlement agreement negotiations and to provide a single Transit Center site to the TJPA. The City is requesting the Port Commission approve the exchange at its January 14, 2020. If approved, the exchange agreement would be considered by the Board of Supervisors Land Use Committee January 27th, and before the full board on February 4th. The State Lands Commission would consider the exchange in February although a date has not been set yet.

Accordingly, Staff request the following:

- Authorization to execute a Trust Exchange Agreement between the City and the Port and the State Lands Commission

Prepared by: Byron A. Rhett
Chief Operating Officer

**PORT COMMISSION
CITY AND COUNTY OF SAN FRANCISCO**

RESOLUTION NO. 20-01

Resolution approving and authorizing a Trust Exchange Agreement with the California State Lands Commission that would remove the public trust from certain Transbay Streets and impress the public trust on certain Fisherman’s Wharf Streets; adopting environmental findings and findings of consistency with the General Plan and the eight Priority Policies of City Planning Code Section 101.1; and authorizing the Port’s Executive Director execute documents, make certain modifications and take certain actions in furtherance of this Resolution.

WHEREAS, Pursuant to Chapter 1333 of the Statutes of 1968 (The “Burton Act”), the State of California granted to the City and County of San Francisco (“City”) certain current and former tide and submerged lands, including a number of public streets, to be held under the jurisdiction of the San Francisco Port (the “Port”) subject the public trust for commerce navigation and fisheries (“Public Trust”); and

WHEREAS, The granted lands include (i) a portion of Beale Street, bounded by Mission Street and Howard Street; (ii) a portion of Mission Street, bounded by Beale Street and First Street; and (iii) a portion of Fremont Street, bounded by Mission Street and Howard Street (collectively, the “Trust Termination Streets”); and

WHEREAS, The Trust Termination Streets are situated in the vicinity of the Salesforce Transit Center (“Transit Center”), are distant from the City’s present waterfront, are not needed to ensure public access to the water, and are longer needed to serve the purposes of the Public Trust or the Burton Act (collectively, the “Trust”); and

WHEREAS, The recently completed Transit Center occupies the airspace and subsurface of a portion of the Trust Termination Streets, and the City has previously agreed to convey title to the occupied areas to the Transbay Joint Powers Authority, which owns and operates the Transit Center pursuant to Ordinance No. 43-11 adopted by the Board of Supervisors on March 8, 2011, on file with the Clerk of the Board of Supervisors in File No. 110019; and

WHEREAS, A proposed structural upgrade for the Millennium Tower located at 301 Mission Street, if approved, may occupy a portion of the surface and subsurface of the Trust Termination Streets adjacent to the building, and the City may wish to convey a permanent easement in the occupied areas

to the owners of the building to provide for the installation of and occupation of infrastructure related to the structural upgrade; and

WHEREAS, The City is not permitted to convey any permanent easement or title in the Trust Termination Streets unless the Trust is terminated therein; and

WHEREAS, Certain public streets owned by the City in or near Fisherman's Wharf are landward of the historic shoreline and are not presently within the Port's jurisdiction or subject to the Trust, but are near the water and have high value for the Trust; and

WHEREAS, These streets include (i) a portion of Beach Street bounded by Leavenworth Street and Van Ness Avenue; (ii) a portion of Hyde Street bounded by Beach Street and Jefferson Street; and (iii) a portion of Bay Street, bounded by Kearney Street and Stockton Street (collectively, the "Trust Addition Streets"); and

WHEREAS, The Trust Addition Streets serve important Trust purposes by providing public access along and to the water and the City's waterfront, including access to Aquatic Park, the Maritime Museum, Hyde Street Pier and Maritime National Historic Park, historic waterfront buildings such as the Cannery and Ghirardelli Square, and The Embarcadero waterfront from Pier 39 to Pier 35; and

WHEREAS, The City seeks to enter into an agreement with the Port and the California State Lands Commission ("State Lands") authorizing a Trust exchange (the "Trust Exchange") pursuant to Section 5 of Chapter 310, Statutes of 1987 ("Chapter 310") whereby the Trust will be lifted from the Trust Termination Streets in exchange for impressing the Trust on the Trust Addition Streets, all as depicted and described on documents on file with the Secretary of this Port Commission; and

WHEREAS, Port and City staff have negotiated with State Lands staff an exchange agreement (the "Trust Exchange Agreement") that will authorize the conveyances necessary to effectuate the Trust Exchange; and

WHEREAS, On November 20, 2019, the Planning Department published a Preliminary Mitigated Negative Declaration ("PMND") for the 301 Mission Street, Millennium Tower Perimeter Pile Upgrade Project (the "Project"). The PMND found that although the Project could have potentially significant impacts on the environment, such impacts will be reduced to a less than significant level because Millennium Tower Association (the "Project Sponsor") will implement all mitigation measures identified in the PMND; and

WHEREAS, The Planning Department prepared and publicized the PMND in compliance with the provisions of the California Environmental Quality Act

(California Public Resources Code Sections 21000 et seq., “CEQA”), the State CEQA Guidelines (California Code of Regulations Title 14 Sections 15000 et seq.), and Chapter 31 of the San Francisco Administrative Code (“Chapter 31”); and

WHEREAS, On December 27, 2019, following the required notice and appeal period, the Planning Department published a Final Mitigated Negative Declaration (“FMND”); and

WHEREAS, In a letter dated December 27, 2019 (the “General Plan Referral Letter”), the City Planning Department determined that the Trust Exchange is, on balance, consistent with the General Plan and with the Eight Priority Policies of City Planning Code Section 101.1; and

WHEREAS, As part of its determination on the General Plan, the Planning Department reviewed and considered the FMND, including the proposed mitigation monitoring and reporting program; and

WHEREAS, As part of the General Plan Referral Letter, the Planning Department adopted CEQA Findings and the proposed mitigation monitoring and reporting program (collectively, “CEQA Findings”) as required by State and local law; and

WHEREAS, The Port Commission hereby adopts and incorporates by reference the CEQA Findings; and, in so doing, the Port Commission approves and endorses the Mitigation Monitoring and Reporting Program for implementation by other City departments; and

WHEREAS, Copies of the General Plan Referral Letter, FMND, CEQA Findings, and the Mitigation Monitoring and Reporting Program are on file with the Secretary of this Port Commission and are incorporated herein by reference; and

WHEREAS, The Port Commission finds that the actions proposed herein are within the scope of the project (“Project”) analyzed in the FMND and subject to the CEQA Findings; and

WHEREAS, The Port Commission further finds that (1) no substantial changes are proposed in the Project and no substantial changes have occurred with respect to the circumstances under which this Project will be undertaken that would cause new significant environmental effects or a substantial increase in the severity of previously identified effects and (2) there is no new information of substantial importance showing that the Project would have any significant effects not discussed in the FMND, that significant effects would be substantially more severe, or that new or different mitigation measures or alternatives would substantially reduce one or more significant effects of the Project; and

WHEREAS, As required by Chapter 310, the Port Commission makes the following findings with respect to the Trust Termination Streets:

1. The Trust Termination Streets have been filled and reclaimed.
2. The Trust Termination Streets are cut off from access to the waters of the San Francisco Bay. The Trust Termination Streets consist of City streets in the Transbay area that are several blocks from the waterfront. No immediate access to the waters of San Francisco Bay exists from the Trust Termination Streets.
3. The Trust Termination Streets comprise a relatively small portion of the Port's trust grant. The total area of the Trust Termination Streets is approximately 143,000 square feet (approximately 3.28 acres). The total amount of granted lands (exclusive of lands presently submerged) held by the Port is approximately 725 acres, of which the Trust Termination Streets represents 0.45%.
4. The Trust Termination Streets are no longer needed or required for the promotion of the Trust. The streets comprising the Trust Termination Streets are physically cut-off from the water, serve no purpose in furthering maritime commerce, navigation or fisheries, and are no longer needed or required for the promotion of the Trust. As public streets, the Trust Termination Streets do not allow for the feasible development of uses that would further Trust goals such as useable or desirable open space or park use or Trust-consistent commercial use, such as hotel or retail. The primary use of the Trust Termination Streets is public access, but the streets are distant from the waterfront and are not required to provide access to the water.
5. The Trust Termination Streets can be removed from the Trust without causing substantial interference with Trust uses and purposes. The use of Trust Termination Streets for non-Trust purposes would not impede any Trust use on the granted lands or otherwise interfere with any Trust purpose. In addition, in exchange for the lifting of the Trust from the Trust Termination Streets, the Port will receive streets into the Trust that have a greater square footage and linear footage than the Trust Termination Streets, and have substantial utility to the Trust; and

WHEREAS, The City's Director of Property ("Director of Property") has determined based on an independent MAI appraisal that the Trust Addition Streets have an appraised value that is equal to or greater than the value of the Trust Termination Streets; and

WHEREAS, In order to accomplish the proposed Trust Exchange, the Board of Supervisors must approve the Trust Exchange and related CEQA findings

substantially the form of the Trust Exchange Agreement which is on file with the Secretary of this Commission and incorporated herein by reference; and

WHEREAS, The Trust Exchange Agreement conforms to all local laws and regulations and is not prohibited by the City's Charter; now, therefore, be it

RESOLVED, That the Trust Exchange is in conformance with the Burton Act and Chapter 310, subject to approval by State Lands; and be it further

RESOLVED, That for reasons set forth herein, the Port Commission finds that the Trust Termination Streets (i) have been filled and reclaimed, and are cut off from access to the waters of the Bay, (ii) comprise a relatively small portion of the Port's trust grant, (iii) are no longer needed or required for the promotion of the Trust, (iv) can be removed from the Trust without causing substantial interference with Trust uses and purposes; and be it further

RESOLVED, That the Trust Addition Streets have a value that is equal to or greater than the value of the Trust Termination Streets, and are useful for the particular trust purposes specifically authorized by the Burton Act; and be it further

RESOLVED, That the Port Commission hereby approves the Trust Exchange and the Trust Exchange Agreement including all attachments and exhibits thereto, and the transactions which such agreement contemplates, materially on the terms and conditions set forth in the Port Commission Memorandum and in such final form as is approved by the City Attorney; and be it further

RESOLVED, That the Port Commission authorizes and directs the Port's Executive Director ("Executive Director") to execute the Trust Exchange Agreement in substantially the form presented to this Commission, and in such final form as if approved by the Executive Director in consultation with the City Attorney; and be it further

RESOLVED, That the Executive Director is hereby authorized and urged, in the name and on behalf of the City and the Port, to (i) execute and deliver any and all conveyance deeds and instruments, and (ii) to take any and all steps (including, but not limited to, the execution and delivery of any and all certificates, agreements, notices, consents, escrow instructions, closing documents and other instruments or documents) as they deem necessary or appropriate in order to implement the Trust Exchange in accordance with the terms of the Trust Exchange Agreement, or to otherwise effectuate the purpose and intent of this resolution, such determination to be conclusively evidenced by the execution and delivery by the Executive Director of any such documents subject to the approval of the Board of Supervisors; and be it further

RESOLVED, That the Executive Director is hereby authorized and urged, in the name and on behalf of the City and the Port, to (i) execute and deliver the deeds to the Trust Termination Streets and the Trust Addition Streets to the State, (ii) accept from the State a Trust patent for the Trust Addition Streets (iii) accept from the State a Trust termination patent for the Trust Termination Streets, and (iv) to take any and all steps (including, but not limited to, the execution and delivery of any and all certificates, agreements, notices, consents, escrow instructions, closing documents and other instruments or documents) as they deem necessary or appropriate in order to consummate the conveyances authorized in the Trust Exchange Agreement, or to otherwise effectuate the purpose and intent of this resolution, such determination to be conclusively evidenced by the execution and delivery by the Director of Property and Executive Director of any such documents; and be it further

RESOLVED, That the Port Commission authorizes the Executive Director and any other appropriate officers, agents or employees of the Port to take any and all steps (including the execution and delivery of any and all certificates, agreements, notices, consents, escrow instructions, closing documents and other instruments or documents) as they or any of them deems necessary or appropriate, in consultation with the City Attorney, in order to consummate the transactions contemplated by the Trust Exchange Agreement, in accordance with this resolution, or to otherwise effectuate the purpose and intent of this Resolution, such determination to be conclusively evidenced by the execution and delivery by any such person or persons of any such documents.

I hereby certify that the foregoing resolution was adopted by the San Francisco Port Commission at its meeting of January 14, 2020.

Secretary

"TRUST ADDITION STREETS" MAP

