



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

DATE: October 18, 2017  
TO: David Silverman  
FROM: Debra Dwyer, Planning Department  
RE: PPA Case No. 2015-015876PPA for 3275-3333 San Bruno Avenue

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

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**415.558.6377**

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Alana Callagy, at (415) 575-8734 or [alana.callagy@sfgov.org](mailto:alana.callagy@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in cursive script that reads "Debra Dwyer".

Debra Dwyer, Senior Planner





# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* October 18, 2017  
*Case No.:* **2016-015876PPA**  
*Project Address:* 3275-3333 San Bruno Avenue  
*Block/Lot:* 5478/003, 004, 005, 006, 007, and 008  
*Zoning:* RM-1 (Residential-Mixed, Low Density) Zoning District  
P (Public) Zoning District  
40-X Height and Bulk District  
*Project Sponsor:* David Silverman, Reuben, Junius and Rose, LLP  
415-567-9000  
*Staff Contact:* Alana Callagy – 415-575-8734  
[alana.callagy@sfgov.org](mailto:alana.callagy@sfgov.org)

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### DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the San Francisco Planning Department regarding the proposed project described in the PPA application submitted on July 17, 2017, as summarized below. This PPA letter identifies planning department review requirements for the proposed project, including those related to environmental review, approvals, neighborhood notification and public outreach, the planning code, project design, and other general issues of concern for the project. Please be advised that the PPA application does not constitute an application for development with the planning department. The PPA letter also does not represent a complete review of the proposed project, does not grant a project approval of any kind, and does not in any way supersede any required planning department approvals listed below.

The planning department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the planning department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Public Works, the San Francisco Municipal Transportation Agency (SFMTA), Department of Public Health (DPH), San Francisco Public Utilities Commission (SFPUC), and others. The information included herein is based on the PPA application and plans dated July 14, 2017, the planning code, general plan, planning department policies, and local, state, and federal regulations as of the date of this document, all of which are subject to change.

### PROJECT DESCRIPTION:

The project proposes to demolish the existing, vacant one-story warehouse (constructed in 1925) on Lot 008, and build four buildings with a total of 20 three-bedroom dwelling units and 22 off-street parking spaces on Block 5478, Lots 003, 004, 005, 006, 007, and 008. In addition to the warehouse, the project site currently contains several small shed structures. In total, the project proposes 42,750 gross square feet of development between the structures on the proposed site, which measures approximately 15,450 square

feet. The project site has approximately 540 feet of frontage along San Bruno Avenue. To the east of the project site is U.S. 101 and San Bruno Avenue to the west. The project is located in the Visitation Valley neighborhood.

The two northernmost proposed buildings would be in a perpendicular plane to San Bruno Avenue while the two southernmost proposed buildings would be in a diagonal plane to the street. The following discussion identifies, from north to south, the number of stories and unit count proposed for the four project buildings:

- The northernmost structure would contain a duplex at 3275/3277 San Bruno Avenue, measuring approximately 29 feet in height (three stories with two units), and a single family residence at 3279 San Bruno Avenue, measuring approximately 22.5 feet in height (two stories with one unit).
- The northernmost of the two middle buildings would contain a duplex with the addresses 3281/3283 San Bruno Avenue (two stories and two units).
- The southernmost of the two middle buildings would contain a single family residence at 3301 San Bruno Avenue (three stories with one unit) and three duplexes at 3303 – 3313 San Bruno Avenue (three stories with six units).
- The southernmost building would contain four duplexes at 3315 – 3329 San Bruno Avenue (three stories with eight units).

The following table identifies the easements located on the project site.

**Table 1**  
**3299 – 3333 San Bruno Avenue Easements**

Easement	Location
Billboard	Between 3279 and 3261 San Bruno Avenue
Sight Line (for billboard)	Rear of the lot for 3275 – 3279 San Bruno Avenue. Over 3281/3283 San Bruno Avenue (restricts building height). Rear of the lot for 3301 – 3309 San Bruno Avenue.
PG&E	Between the 3285 and 3301 San Bruno Avenue
San Francisco Water	In the middle of the northernmost PG&E easement in the project area
PG&E	Between 3311/3313 San Bruno Avenue and 3315/3317 San Bruno Avenue

The project would include 20 *class 1* bike parking spaces and 6 *class 2* bike parking spaces.<sup>1</sup> The project would include eleven new curb cuts on San Bruno Avenue for the garages. There are currently two curb cuts on San Bruno Avenue at the northern end of the project site.

<sup>1</sup> Section 155.1(a) of the planning code defines *class 1* bicycle spaces as “spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, nonresidential occupants, and employees” and defines *class 2* bicycle spaces as “spaces located in a publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use.”

**PRELIMINARY PROJECT COMMENTS:**

The following comments address general issues that may affect the proposed project:

1. **Site Design, Massing, and Open Space.** The planning department recommends exploring reorienting and reconfiguring the building massing to achieve several goals:
  - Rather than a series of individual stacked units with their own entries and parking, these blocks of housing could be reconfigured to work as more efficient multi-family buildings.
  - The department recommends providing enough units to maximize the density and a preference for family-sized dwellings.
  - The open spaces between the areas of housing should be programmed and have active uses facing them as well so that they are considered courtyards or side yards more than spaces between blank edges of housing. These volumes should be thought of three-dimensionally and visually engaging on each side.Overall, the project should achieve compliance with the Residential Design Guidelines.
2. **Removal of General Advertising Signage.** If feasible, the department would recommend removing the billboard sign and General Advertising Sign. Removal of this sign may permit additional area for new residential use.
3. **P (Public) Zoning District.** Currently, a portion of the project site is located in the P (Public) Zoning District (Block 5478 Lots 007 and 008). As such, construction of new residential use cannot occur within the portions of the site, which are located in the P Zoning District. Please see additional information about this issue in the preliminary planning code section below.

**ENVIRONMENTAL REVIEW:**

The proposed project requires environmental review in accordance with the California Environmental Quality Act (CEQA). This section identifies the likely environmental review process and additional information and studies necessary to complete environmental review. Formal environmental review begins with planning department review of the **Environmental Evaluation Application (EEA)** filed by the project sponsor. The EEA can be submitted at the same time as the PPA application or subsequent to issuance of the PPA letter.

The environmental review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted. **Note that until an entitlement application is submitted to the Current Planning Division, only the proposed project description will be reviewed by the assigned environmental coordinator.** EEAs are available in the planning department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at <http://sf-planning.org/permit-forms-applications-and-fees>. See "Environmental Applications" on page 2 of the current Fee Schedule for a calculation of environmental application fees.<sup>2</sup> A detailed and accurate description of the proposed project is essential for adequate environmental review. Please

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<sup>2</sup> San Francisco Planning Department. Fee Schedule for Application Fees. Available online at: <http://sf-planning.org/permit-forms-applications-and-fees>.

update the EEA project description as necessary to reflect feedback provided in this PPA letter and include the additional information and/or documents requested herein and listed again below.

- Project plans that include the elevations for all buildings, the dimensions of existing and proposed sidewalks, the dimensions of existing and proposed curb cuts, and show the existing bus stop.
- Depth of construction and volume of excavation.
- Detailed information related to construction equipment, and phasing and duration of each phase.
- A historic resource evaluation prepared by qualified professional.
- A preliminary geotechnical report prepared by qualified professional.
- A streetscape plan pursuant to section 138.1.
- Phase 1 environmental site assessment.
- Phase 2 environmental site assessment, if available.
- Copy of a Maher application and Article 38 application filed with the public health department.

If you have already filed your EEA, you may provide the requested information and documents as supplements to your application. Please note that the EEA may be placed on hold pending receipt of information articulated in this letter as required for environmental review, including a stable project description.

#### *Environmental Review Document*

If it is determined that the project could result in a significant impact, an initial study would be prepared. The initial study may be prepared either by an environmental consultant from the department's environmental consultant pool or by department staff. Should you choose to have the initial study prepared by an environmental consultant, contact Chelsea Fordham at (415) 575-9071 for a list of three eligible consultants. If the initial study finds that the project would have a significant impact that could be reduced to a less-than-significant level by mitigation measures agreed to by the project sponsor, then the department would issue a preliminary mitigated negative declaration (PMND). The PMND would be circulated for public review, during which time concerned parties may comment on and/or appeal the determination. If no appeal is filed, the planning department would issue a final mitigated negative declaration (FMND). Additional information regarding the environmental review process can be found at: <http://sf-planning.org/environmental-review-process>.

If the initial study indicates that the project would result in a significant impact that cannot be mitigated to below a significant level, an Environmental Impact Report (EIR) will be required. An EIR must be prepared by an environmental consultant from the planning department's environmental consultant pool (<http://sf-planning.org/consultant-sponsor-resources>). The planning department will provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

Below is a list of topic areas addressed through the environmental review process. Based on a preliminary review of the project as it is proposed in the PPA application, some of these topics would require additional study.

1. **Historic Resources.** The project site contains one or more buildings or structures considered to be a potential historic resource (constructed 45 or more years ago); therefore, the proposed project is subject to review by the department's historic preservation staff. Lots 003 to 007 appear to be vacant parcels and Lot 008 contains two Category B structures that have not been previously surveyed either as individual resources or as part of a historic district and need to be reviewed. To assist in this review, the project sponsor must hire a qualified professional to prepare a *historic resource evaluation*. The professional must be selected from the planning department's historic resource consultant pool. Please contact Pilar LaValley, Senior Preservation Planner, via email ([pilar.lavalley@sfgov.org](mailto:pilar.lavalley@sfgov.org)) for a list of three consultants from which to choose. Please contact the evaluation scoping team at [HRE@sfgov.org](mailto:HRE@sfgov.org) to arrange the evaluation scoping. Following an approved scope, the historic resource consultant should submit the draft evaluation for review to the environmental planning division after the project sponsor has filed the EEA and updated it as necessary to reflect feedback received in the PPA letter. The evaluation should be submitted directly to the department and copied to the project sponsor. Project sponsors should not receive and/or review advance drafts of consultant reports per the Environmental Review Guidelines. Historic preservation staff will not begin reviewing your project until a complete draft evaluation is received.
2. **Archeological Resources.** The proposed project will require *preliminary archeological review* by a planning department archeologist. To aid this review the department archeologist may request a *preliminary archeological sensitivity assessment* by a department qualified archeological consultant, subject to the review and approval by the department archeologist. The department archeologist will provide three names from the qualified archeological consultant list if the assessment is required. The report will assess the archeological sensitivity of the project site based on in-house source material and will consider the potential for archeological impacts resulting from proposed soils disturbance. Please provide detailed information, including sections, proposed soils-disturbing activities, such as grading, excavation, installation of foundations, soils improvement, and site remediation in the EEA, and submit any available geotechnical/soils or *phase II environmental site assessment* hazardous materials reports prepared for the project to assist in this review. If the department archeologist determines that the project has a potential to adversely affect archeological resources, the report will identify additional measures needed to address the potential effect. These measures may include preparation of an archeological research design and treatment plan, implementation of project mitigation measures (such as archeological testing, monitoring, or accidental discovery), or other appropriate measures.
3. **Tribal Cultural Resources.** Tribal cultural resources (TCRs) are a class of resource established under CEQA in 2015. TCRs are defined as a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American tribe, that is either included on or eligible for inclusion in the California Register of Historical Resources or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines is a TCR. Planning department staff will review the proposed project to determine if it may cause an adverse effect to a TCR; this will occur in tandem with preliminary archeological review. No additional information is needed from the project sponsor at this time. Consultation with California Native American tribes regarding TCRs may be required at the request of the tribes. If staff determines that the proposed project may have a potential significant adverse impact on a TCR, mitigation measures

will be identified and required. Mitigation measures may include avoidance, protection, or preservation of the TCR and development of interpretation and public education and artistic programs.

4. **Transportation.** Based on the PPA submittal, a *transportation impact study* is not anticipated; an official determination will be made subsequent to submittal of the EEA. Planning staff propose the following recommendations:

- Include dimensions of existing and proposed sidewalk on plans.
- Include dimensions of existing and proposed curb cuts on plans.
- Show existing bus stop on plans.

Based on the street frontage of the project site, a streetscape plan pursuant to Planning Code section 138.1 is required. Please see the comments in the preliminary planning code section below. To the extent that features of the streetscape plan relate to site circulation and access, it is advisable that this plan be incorporated into the project description for the EEA.

5. **Noise.** Construction noise is subject to the San Francisco Noise Ordinance (article 29 of the San Francisco Police Code), which includes restrictions on noise levels of construction equipment and hours of construction. If pile driving is to be used during construction, measures to reduce construction noise may be required as part of the proposed project. The EEA should provide a construction schedule and indicate whether pile driving or other particularly noisy construction methods are required.

6. **Air Quality.**

*Criteria Air Pollutants.* At 20 units the proposed project is below the Bay Area Air Quality Management District's (BAAQMD) construction and/or operational screening levels for criteria air pollutants.<sup>3</sup> Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required. However, please provide detailed information related to the volume of excavation as part of the EEA.

In addition, if project-related, excavation would exceed 10 cubic yards or 500 square feet of soil disturbance construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the proposed project will be required to adhere to the dust control requirements set forth in the Construction Dust Ordinance contained in San Francisco Health Code article 22B and San Francisco Building Code section 106.A.3.2.6.

*Local Health Risks and Hazards.* The project site is located within an *air pollutant exposure zone*, as mapped and defined by health code article 38. The *air pollutant exposure zone* identifies areas with poor air quality based on modeling of air pollution, exposures, and health vulnerability from

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<sup>3</sup> BAAQMD, CEQA Air Quality Guidelines, May 2011, Chapter 3.



mobile, stationary, and area source emissions within San Francisco. The project proposes to construct new sensitive land uses (i.e., residential uses), which are subject to enhanced ventilation measures pursuant to health code article 38. The project sponsor will be required to submit an Article 38 application to DPH prior to the issuance of any environmental determination. Please provide a copy of the initial application with the EEA.<sup>4</sup>

Equipment exhaust measures during construction will likely also be required. Please provide detailed information related to construction equipment, phasing and duration of each phase, and the volume of excavation as part of the EEA.

If the project would generate new sources of toxic air contaminants including, but not limited to, emissions from diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors and additional measures will likely be required to reduce stationary source emissions. Based on the information in the PPA application, the proposed project likely would not require a backup diesel generator due to the proposed height, but this will be confirmed at the time of the EEA submittal.

7. **Greenhouse Gases.** *The City and County of San Francisco's Strategies to Address Greenhouse Gas Emissions* presents a comprehensive assessment of policies, programs, and ordinances that represents San Francisco's Qualified Greenhouse Gas (GHG) Reduction Strategy. Projects that are consistent with San Francisco's Qualified GHG Reduction Strategy would result in less-than-significant impacts from GHG emissions. In order to facilitate a determination of compliance with San Francisco's Qualified GHG Reduction Strategy, the planning department has prepared a Greenhouse Gas Analysis Compliance Checklist.<sup>5</sup> The project sponsor may be required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco's Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.
8. **Wind.** As currently designed, the proposed project would not involve construction of a building over 80 feet in height. Therefore, a consultant-prepared wind analysis is not required.
9. **Shadow.** The proposed project would not result in construction of a building greater than 40 feet in height. Therefore, preparation of a consultant-prepared shadow study is not required.
10. **Geology.** A geotechnical study prepared by a qualified consultant is not required but would facilitate the review, especially in relation to archeology and is encouraged. The study should provide recommendations for any geotechnical concerns identified in the study. In general, compliance with the building codes would avoid the potential for significant impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement. To assist planning department staff in determining whether the project would result in environmental

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<sup>4</sup> Refer to <http://www.sfdph.org/dph/eh/Air/default.asp> for more information.

<sup>5</sup> Refer to <http://sf-planning.org/consultant-sponsor-resources> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

impacts related to geological hazards, it is recommended that you provide a copy of the geotechnical information with boring logs for the proposed project. This study will also help inform the planning department archeologist of the project site's subsurface geological conditions.

- 11. Hazardous Materials.** The proposed project is located on a site with known or suspected soil and/or groundwater contamination. Therefore, the project is subject to article 22A of the health code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the DPH, requires the project sponsor to retain the services of a qualified professional to prepare a *phase I environmental site assessment* that meets the requirements of Health Code section 22.A.6. The site assessment would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

DPH requires that projects subject to the Maher Ordinance complete a Maher Application, available at: <http://www.sfdph.org/dph/EH/HazWaste/hazWasteSiteMitigation.asp>. Fees for DPH review and oversight of projects subject to the ordinance would apply. Please refer to DPH's fee schedule, available at: <http://www.sfdph.org/dph/EH/Fees.asp#haz>. Please provide a copy of the submitted Maher Application and Phase I site assessment with the EEA.

Because the existing building was constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. The BAAQMD is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to demolition of buildings with asbestos.

## 12. Disclosure Report for Developers of Major Projects.

San Francisco Campaign and Governmental Conduct Code section 3.520 et seq. requires the developer of any project with estimated construction costs exceeding \$1,000,000 to submit a *Disclosure Report for Developers of Major City Projects* if the project requires the issuance of a CPE, certification of an EIR, adoption of a FMND, or a project approval by the Planning Commission that adopts CEQA Findings (EIR certification). A residential development project with four or fewer dwelling units is not required to file this report. The first (or initial) report must be filed within 30 days of the date of EIR certification or final environmental determination under CEQA. Please submit a *Disclosure Report for Developers of Major City Projects* directly to the San Francisco Ethics Commission. This form can be found at the planning department or online at <http://www.sfethics.org>.

## PRELIMINARY PLANNING CODE AND PROCEDURAL COMMENTS:

The following comments address preliminary planning code issues that may substantially affect the design and massing of the proposed project:

- 1. P (Public) Zoning District.** Currently, a portion of the project site is located in the P (Public) Zoning District (Block 5478 Lots 007 and 008). As such, construction of new residential use cannot occur within the portions of the site, which are located in the P Zoning District. Please review the project

- plans, and ensure that the project does not intrude into the portions of the project site located in the P Zoning District. Alternatively, as part of the proposed project, that portion of the site could be re-zoned consistent with the remainder of the site to allow for residential development.
2. **Rear Yard.** Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth. The project does not provide a code-complying rear yard. Therefore, the project requires a variance from the zoning administrator.
  3. **Open Space – Residential.** Section 135 requires 133 square feet of common open for each dwelling unit. Additionally, any such open spaces must meet the dimensional requirements of subsections (f) and (g). The project provides approximately 5,000 square feet of common open space, and appears to provide the code-required amount of open space; however, much of this open space appears to be designated within the easement zones. The project sponsor will be required to clarify if the easements are permitted to possess common open space for residential units. Additional information and research will be required.
  4. **Permitted Obstructions.** Section 136 outlines the requirements for obstructions permitted over the street. Currently, the Project appears to provide angled bay windows, which do not conform to the dimensional requirements of the planning code. Please revise the project to provide code-conforming bay windows.
  5. **Dwelling Unit Exposure.** Section 140 requires that each dwelling unit have at least one room that meets the 120-square-foot minimum superficial floor area requirement of section 503 of the Housing Code face directly on a street right-of-way, code-complying rear yard, or an appropriately sized courtyard. All dwelling units appear to face onto San Bruno Avenue; therefore, the project appears to meet this requirement.
  6. **Street Frontage.** Section 144 controls the entrances to off-street parking and limits the amount of garage frontage on the ground story of new dwelling units. Please review this requirement and provide additional information in future applications. Please add a diagram to demonstrate how the project meets this requirement.
  7. **Moderation of Building Fronts.** Section 144.1 requires new construction to be stepped in building height and to provide variation along the street. Please demonstrate compliance with this requirement and provide additional information in future submittals.
  8. **Off-Street Parking.** Section 151 outlines the requirements for required off-street parking. In the RM-1 Zoning District, all dwelling units are required to provide one off-street parking space per dwelling unit. Currently, the project proposes 22 off-street parking spaces. The project is permitted a limited number of accessory parking spaces. The two additional accessory parking spaces are permitted per Planning Code section 151.
  9. **Transportation Demand Management (TDM) Program.** The TDM Program was adopted by the Board of Supervisors in February 2017, and it took effect on March 19, 2017. The proposed project includes construction of 20 dwelling units (or a total of 42,750 gross square feet of residential use) and

22 off-street parking spaces, and thus is subject to the TDM Program. Based on the proposed 22 parking spaces associated with the residential use, the project will be required to meet or exceed a target score of 10 points for land use category C.

Please note that if the first Development Application – as defined in Planning Code section 401 – is submitted by December 31, 2017, then the project will only be required to meet 75 percent of its target score. To date, the project has not submitted a TDM Application and/or plan. Please review the TDM Program requirements, and submit the appropriate application.

Please be aware that additional review of the selected TDM plan may be needed, and that revisions to the project may result in the need to revise the project's TDM plan as well.

10. **Streetscape Plan – Better Streets Plan Compliance.** Pedestrian and streetscape improvements consistent with the Better Streets Plan are required if your project meets the conditions delineated in Planning Code section 138.1. Projects that trigger section 138.1 will be reviewed by the department's Streetscape Design Advisory Team (SDAT). SDAT is an interagency group that includes representatives from the planning department, Public Works, and SFMTA that provides design guidance on private developments that impact the public right-of-way.

Based on the submitted plans, the project triggers the requirements of a *streetscape plan* because this project involves new construction of a lot with more than 250 feet of lot frontage on a public right-of-way. This *streetscape plan* shall be submitted to the planning department no later than 60 days prior to any Planning Commission action, and shall be considered for approval at the time of other project approval actions. As specified under Transportation in the Environmental Review section of this letter, the proposed project does not likely require a transportation impact analysis. However, the *streetscape plan* may inform the analysis regarding site circulation and access. Therefore, the streetscape plan should be submitted early in the environmental review process so that it may be incorporated into that analysis, as appropriate. The *streetscape plan* should show the location, design, and dimensions of all existing and proposed streetscape elements in the public right-of-way directly adjacent to the fronting property, including street trees, sidewalk landscaping, street lighting, site furnishings, utilities, driveways, curb radii, and curb lines, and the relation of such elements to proposed new construction and site work on the property. Please see the department's Better Streets plan and section 138.1(c)(2)(ii) for the additional elements that may be required as part of the project's *streetscape plan*.

11. **Bicycle Parking (Class 1).** Planning code section 155 requires this project to provide at least 20 *class 1* bicycle parking spaces. The proposed project contains 20 *class 1* bicycle parking; therefore, the project meets this requirement.
12. **Bicycle Parking (Class 2).** Planning code section 155 requires the project to provide at least 6 *class 2* bicycle parking spaces provided through on-street bicycle racks; however SFMTA has final authority on the type, placement and number of *class 2* bicycle racks within the public right-of-way. Prior to issuance of first architectural addenda, you will be required contact the SFMTA Bike Parking Program at [bikeparking@sfmta.com](mailto:bikeparking@sfmta.com) to coordinate the installation of on-street bicycle racks and ensure that the proposed bicycle racks meet the SFMTA's bicycle parking guidelines. Depending on

local site conditions and anticipated demand, SFMTA may request the project sponsor pay an in-lieu fee for *class 2* bike racks required by the planning code. The SFMTA bicycle parking guidelines can be found at: <https://www.sfmta.com/services/streets-sidewalks/installation-requests/bicycle-racks-corrals>.

13. **First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. For more information, please contact:

Ken Nim, Workforce Compliance Officer  
CityBuild, Office of Economic and Workforce Development  
City and County of San Francisco  
50 Van Ness Avenue, San Francisco, CA 94102  
(415) 581-2303

14. **Stormwater.** If the project results in a ground surface disturbance of 5,000 square feet or greater (creating and/or replacing 5,000 square feet or more of impervious surface), it is subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding SFPUC Stormwater Design Guidelines (guidelines). Projects that trigger the stormwater management requirements must prepare a Stormwater Control Plan demonstrating project adherence to the performance measures outlined in the guidelines including: (a) reduction in total volume and peak flow rate of stormwater for areas in combined sewer systems OR (b) stormwater treatment for areas in separate sewer systems. The SFPUC Wastewater Enterprise, Urban Watershed Management Program is responsible for review and approval of the Stormwater Control Plan. Without SFPUC approval of a Stormwater Control Plan, no site or building permits can be issued. The guidelines also require a signed maintenance agreement to ensure proper care of the necessary stormwater controls. Compliance may occur through a mix of rooftop, sidewalk, and open space treatments and technologies, and is encouraged to be designed as a comprehensive system that maximizes co-benefits for greening, habitat creation, urban heat island reduction, building energy savings, and beautification. Systems within the public realm should consider adjacencies and opportunities for flow-through systems to neighborhood detention areas. To view the Stormwater Management Ordinance, the Stormwater Design Guidelines, or download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>. Applicants may contact [stormwaterreview@sfwater.org](mailto:stormwaterreview@sfwater.org) for assistance.

15. **Recycled Water.** Projects located in San Francisco's designated recycled water use areas are required to install recycled water systems for irrigation, cooling, and/or toilet and urinal flushing in accordance with the Recycled (or Reclaimed) Water Use Ordinance, adopted as article 22 of the San Francisco Public Works code. New construction or major alterations with a total cumulative area of 40,000 square feet or more; any new, modified, or existing irrigated areas of 10,000 square feet or more; and all subdivisions are required to comply. To determine if the proposed project is in a designated recycled water use area, and for more information about the recycled water requirements, please visit [sfwater.org/index.aspx?page=687](http://sfwater.org/index.aspx?page=687).

16. **Better Roofs Ordinance.** In 2016, San Francisco became the first major city in the U.S. to require the installation of renewable energy facilities or living roofs on new buildings. The Better Roofs

Ordinance will require between 15 and 30 percent of roof space to incorporate solar (photo voltaic [PV] and/or solar thermal systems), living (green) roofs, or a combination of both. The legislation went into effect January 2017. The ordinance provides guidance for developers, designers, and/or owners might best utilize rooftop space; ideally, projects should pursue holistic design and amenity enhancements for 100 percent of usable roof space that include open space, habitat, stormwater management, urban agriculture, and other beneficial uses. Please see the planning department's Living Roof Manual to learn more: <http://sf-planning.org/department-publications>.

17. **Sustainability and Green Building.** San Francisco has a suite of existing sustainability related regulations, including recycling and composting, solar, and more details outlined in the San Francisco Green Building code. Per the code, this project must meet the standards of LEED Silver or the equivalent GreenPoint rating system. It is recommended that the project sponsor work with the San Francisco Planning, Building, and Environment departments to determine the most beneficial mix of green building strategies that meet or exceed all current requirements, and best fit the local context. This especially includes the provision of renewable energy on site (PV and solar thermal), living roofs and walls, non-potable water reuse, healthy environments (non-toxic building materials), and other innovative approaches to enhancing performance of the City's environment. The City also encourages projects to maximize energy and water efficiencies, consider zero carbon strategies such as all-electric buildings, and commit to green power purchases for 100 percent GHG-free electricity. As with non-potable water systems, projects are recommended to consider district-scale energy opportunities on site and in coordination with neighbors.
18. **Refuse Collection and Loading.** San Francisco is a national leader in diverting waste from landfills, has a Mandatory Recycling and Composting Ordinance, and has a goal to achieve zero waste by 2020. In this, the City requires all buildings to be designed with spaces for collecting and loading recycling and composting in common and private areas, and make these options as or more convenient than waste disposal. More information on the complete suite of the City's Zero Waste legislation may be found here: <http://sfenvironment.org/zero-waste/overview/legislation>. Please also see the Guidance on Recycling Design (page 3) resources for designing appropriate areas: [http://sfenvironment.org/sites/default/files/fliers/files/sfe\\_zw\\_ab088.pdf](http://sfenvironment.org/sites/default/files/fliers/files/sfe_zw_ab088.pdf). Free design and implementation assistance is available from the San Francisco Department of the Environment's Zero Waste Team by calling 415-355-3700.
19. **HOME-SF and State Density Programs.** The proposed development at the subject site may be eligible to participate in the HOME-SF Program. HOME-SF is an optional program for developers constructing mixed-income in certain areas of San Francisco. Under HOME-SF, 30 percent of the units in a new housing project must be affordable to low, middle and moderate-income families. To provide more family friendly housing, 40 percent of the total units in the building must be two bedrooms or larger (with an additional option of providing 50 percent of all bedrooms in the project in units with two or more bedrooms.). In return, density bonuses and zoning modifications are provided, allowing project sponsors to accommodate additional affordable units. Alternatively, the proposed development may also be eligible for the State Density Program. For information on either HOME-SF or the State Density Program, see the following: <http://sf-planning.org/HOME-SF> and <http://sf-planning.org/density-bonus-programs>.

**PRELIMINARY DESIGN COMMENTS:**

The following comments address preliminary design issues that may substantially affect the proposed project:

1. **Site Design, Massing, and Open Space.** The planning department recommends exploring reorienting and reconfiguring the building massing to achieve several goals:
  - Rather than a series of individual stacked units with their own entries and parking, these blocks of housing could be reconfigured to work as more efficient multi-family buildings.
  - The department recommends providing enough units to maximize the density and a preference for family-sized dwellings.
  - The open spaces between the areas of housing should be programmed and have active uses facing them as well so that they are considered courtyards or side yards more than spaces between blank edges of housing. These volumes should be thought of three-dimensionally and visually engaging on each side.
  
2. **Street Frontage.** A massing shift would also support these goals for the frontage and access:
  - Reduce the number of driveway entries. This could be done by reorienting the parking to face towards organized entries—like a mews—where several garage entries only cross the sidewalk in one place.
  - Explore whether parking can be consolidated and moved rearward.
  - Limit the number of curb cuts on San Bruno Avenue.
  - Any driveways should be feasible, and should not impact transit or bicycles on San Bruno Avenue.
  - The sponsor should keep curb cuts to a minimum, particularly within the existing bus stop, which is not moving from its current location fronting the project.
  - The residential entries for pedestrians should be oriented towards the street. Currently the driveway entrances dominate the ground level towards the sidewalk. Maximize active uses at these frontages instead.
  - The project sponsor will be expected to propose a lighting plan for San Bruno Avenue. Please provide photometric studies for the proposed lighting design, which complies per requirements specified by Illuminating Engineering Society (IES) RP-8. Reference SFPUC's streetlight catalogue for approved pedestrian scaled poles and light fixtures. Lighting fixtures selected outside of the SFPUC catalogue will be maintained by the property owner(s). Please contact [streetlights@sfwater.org](mailto:streetlights@sfwater.org) with any questions.
  
3. **Architecture.** Consider programming main interior spaces to towards the street to buffer living spaces from the highway noise and pollution and to offer more animated façade engagement with San Bruno. On the exterior, the department recommends the use of high-quality materials and depth at windows.