



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** July 10, 2017  
**TO:** Rob Zirkle, Brick Inc.  
**FROM:** Tania Sheyner, Planning Department  
**RE:** Case No. 2017-004557PPA for 550 O'Farrell Street

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

Reception:  
**415.558.6378**

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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Julie Moore, at (415) 575-8733 or [Julie.Moore@sfgov.org](mailto:Julie.Moore@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in cursive script, appearing to read "Tania Sheyner", written over a horizontal line.

Tania Sheyner, Environmental Planner





# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* July 10, 2017  
*Case No.:* 2017-004557PPA  
*Project Address:* 550 O'Farrell Street  
*Block/Lot:* 0318/009  
*Zoning:* RC-4 (Residential-Commercial High Density)  
North of Market Residential Special Use District  
80T-130T  
*Project Sponsor:* Rob Zirkle, Brick, Inc.  
510-516-0167  
*Staff Contact:* Julie Moore – (415) 575-8733  
[Julie.Moore@sfgov.org](mailto:Julie.Moore@sfgov.org)

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### DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on April 11, 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 Municipal Transportation Agency, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on the PPA application and plans, the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

### PROJECT DESCRIPTION:

The 550 O'Farrell Street project site encompasses an 11,808-square-foot (sf) lot located between Leavenworth Street and Jones Street in the Downtown/Civic Center neighborhood. The proposal is to demolish the existing two-story-plus-basement, 35,424-square-foot (sf) parking garage on the site and construct a 13-story, 130-foot-tall, 102,844-sf mixed use building. The existing building was constructed in 1924 and is located within the Uptown Tenderloin Historic District. The proposed new building would

include 115 dwelling units (88 studios and 27 one-bedroom units) and 1,442 sf of retail space above a two level basement with parking for 21 vehicles, including one car share space. In addition, the proposed parking garage would include two bicycle storage rooms providing 108 Class 1 bicycle spaces. Three street trees and seven Class 2 bicycle spaces would be installed along the site's O'Farrell Street frontage. The project would include a total of 7,786 sf of open space, consisting of common open spaces on level 2 and the roof, and some private balconies. Due to the existing basement, project construction would not require additional excavation, except for the elevator pit and building foundations; the depth and volume of excavation is not yet known.

### PRELIMINARY PROJECT COMMENTS:

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

1. **Density Maximization and Affordable Housing Provision.** It is the Department's priority to give precedence to the development of all new net housing, and to encourage the direct building of more affordable housing and the maximization of permitted density, while maintaining quality of life and adherence to Planning Code standards. The proposed project is maximizing the permitted density by referencing the North of Market Residential SUD Subarea No.1 density ratio, and the Exceptions to Dwelling Unit Density Limits in Section 207(c)1 of the Planning Code.
2. **North of Market Residential Special Use District.** Section 249.5 outlines the goals, allowable uses and design requirements for the special use district in which the subject property is located. Language in the code supports projects that preserve buildings of architectural and historic importance and to preserve the existing scale of development when designing new infill housing. As discussed in this section, supporting commercial uses should be intended to serve residents of the area. Sections 249.5(c)(4), 249.5(c)(5), and 249.5(c)(6) further outline controls related to building massing. Section 249.5(c)(3) specifies those uses that are not permitted in the North of Market Residential Special Use District.

Section 249.5(c)(4) states density allowances of one dwelling unit for each 125 square feet of lot area. Based on the lot area, 93 dwelling units are allowable under Sec. 249.5(c)(4). The dwelling unit density may be increased to the proposed 115 units in accordance with planning code Section 209.3(8).

3. **Setbacks in the North of Market Residential Special Use District.** Section 132.2 and Section 270 regarding setbacks and bulk controls apply to the subject property. Because the proposed project will require Conditional Use Authorization for construction in excess of 50 feet in height, the sponsor should study the prevailing streetwall height on the block for inclusion in the project submittal materials. Section 132.2(c) states that, above the prevailing streetwall height, setbacks of up to 20 feet may be required. Areas of the building above the prevailing streetwall height will also be subject to "T" bulk controls, which limit floor plate sizes to 110 feet in length with a diagonal dimension of 125 feet. If the applicant can demonstrate that a building without a setback would not disrupt the continuity of the prevailing streetwall along O'Farrell Street, then the Planning Commission may grant approval of a Conditional Use Authorization without imposing a setback requirement.

The City Planning Commission shall impose conditions on the approval of applications for conditional use authorization, required pursuant to Section 253 for buildings which exceed 40 feet in height in an R District, if such authorization includes a grant of an exception to the 80-foot base

height limit, in order to mitigate the impact that such height exception is likely to have on the existing supply of affordable housing in the area. The condition shall require that the applicant pay a fee to the City Controller which shall be deposited in the North of Market Affordable Housing Fund.

4. **Uptown-Tenderloin National Register District.** Adopted on February 5, 2009, the historic district in which the subject property is located is primarily comprised of multi-unit apartment and hotel buildings constructed in the late-19<sup>th</sup> to early-20<sup>th</sup> century. Specifically, the district's period of significance was identified as the years spanning 1906-1957. Historic residential buildings are typically three to seven stories in height, built out to the streetwall with highly elaborate residential entrances. Facades are of high-quality, durable masonry materials such as brick, terra cotta and cement stucco in a light-toned color palette. The existing building on the site is a Gothic Revival style garage building designed by architect W.H. Crim for the Mount Olivet Cemetery Association and completed in 1924. Demolition of existing buildings and compatibility of new construction within a National Register district requires advanced historical review in fulfillment with the California Environmental Quality Act as part of the Planning Department review process.

#### **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>1</sup> In addition, please see page 4 of the Fee Schedule for monitoring fees applicable to projects that require active monitoring of mitigation measures.

A detailed and accurate description of the proposed project is essential for adequate environmental review. Please 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.

- Information regarding project excavation details, construction equipment (particularly use of pile driving or other particularly noisy construction methods) and schedule, proposed HVAC equipment and stationary sources such as emergency backup generators.
- Plans showing the dimensions of existing and proposed sidewalks, curb cuts, and loading areas.

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<sup>1</sup> San Francisco Planning Department. Fee Schedule for Application Fees. Available online at: <http://sf-planning.org/permit-forms-applications-and-fees>.

If you have already filed your EEA, you may provide the requested information and documents as supplements to your application.

#### *Environmental Review Document*

If the additional analysis outlined below indicates that the project would not have a significant effect on the environment, the project could be eligible for a Class 32 infill development categorical exemption under CEQA Guidelines Section 15332. If a Class 32 exemption is appropriate, Environmental Planning staff will prepare a certificate of exemption.

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 Jessica Range at (415) 575-9018 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 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 proposes demolition of a contributor to the Uptown Tenderloin National Register Historic District; therefore, the proposed project is subject to review by the Department's Historic Preservation staff. To assist in this review, the project sponsor must hire a qualified professional to prepare a Historic Resource Evaluation (HRE) report. The HRE scope will require an individual evaluation of the subject building which was not completed as part of the previous survey. The HRE scope will also require a project analysis. The qualified professional must be selected from the Planning Department's Historic Resource Consultant Pool. Please contact Tina Tam, Senior Preservation Planner, via email ([tina.tam@sfgov.org](mailto:tina.tam@sfgov.org)) for a list of three consultants from which to choose. The selected consultant must scope the HRE in consultation with Department Historic Preservation staff. Please contact the HRE scoping team at [HRE@sfgov.org](mailto:HRE@sfgov.org) to arrange the HRE scoping. Following an approved scope, the historic resource consultant should submit the draft HRE report for review to Environmental Planning after the project sponsor has filed the EE Application and updated it as necessary to reflect feedback received in the PPA letter. The HRE 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 HRE is received.

2. **Archeological Resources.** The proposed project will require Preliminary Archeological Review (PAR) by a Planning Department archeologist. To aid this review the Department archeologist may request a Preliminary Archeological Sensitivity Assessment (PASS) 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 PASS is required. The PAR 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 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 PAR 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 the California Environmental Quality Act (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. Additionally, the proposed project is located on a high injury corridor as mapped by Vision Zero. Planning staff have reviewed the proposed site plans and request the following additional information, some of which address the safety of persons walking and bicycling to and from the project site and vicinity:
  - Include dimensions of existing and proposed sidewalk on plans;
  - Include dimensions of existing and proposed curb cuts on plans; show existing curb cuts to be removed on plans
  - Indicate where loading will occur; clarify what is meant by visitor loading.

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.

It is anticipated that the proposed project could include HVAC equipment and a backup generator. Depending upon the equipment needed, the proposed project may generate noise that could result in a substantial permanent increase in ambient noise levels. Please provide details regarding proposed HVAC equipment and backup generators as part of the EEA. The assigned environmental coordinator will review proposed project plans and may request that a noise study be prepared by a qualified acoustical consultant. If required, the noise study would include at a minimum: measurements of the existing noise environment, discussion of applicable noise regulations, analysis of the project's noise effects and the ability of noise sources to meet applicable noise standards. The acoustical consultant shall prepare a noise study scope of work for approval by the assigned environmental coordinator prior to conducting the study.

6. **Air Quality.** The proposed project, with 115 dwelling units, is below the Bay Area Air Quality Management District's (BAAQMD) construction and operation screening levels for criteria air pollutants. Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required. However, please provide detailed information related to construction equipment, phasing and duration of each phase, and volume of excavation as part of the EEA. In addition, project-related demolition, excavation, grading and other 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.

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 mobile, stationary, and area source emissions within San Francisco. The project proposes to construct new sensitive land uses (i.e., residential), 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 Article 38 application with the EEA.

Also, if the project would include 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. Please provide detailed information related to any proposed stationary sources with the EEA.



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>2</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.** The proposed project would involve construction of a building over 80 feet in height. The project will therefore require a consultant-prepared wind analysis, which may include wind tunnel analysis if needed. The consultant will be required to prepare a proposed scope of work for review and approval by the Environmental Planning coordinator prior to proceeding with the analysis.
9. **Shadow.** The proposed project would result in construction of a building greater than 40 feet in height. A preliminary shadow fan analysis prepared by Planning Department staff indicates that the proposed project would not cast shadows on any Recreation and Park property subject to Section 295 or other publicly accessible non-Recreation and Park properties including schoolyards. Therefore, no additional shadow analysis is necessary.
10. **Geology.** The project site is located on a slope greater than 20 percent. A geotechnical study prepared by a qualified consultant must be submitted with the EEA. The study should address geotechnical constraints related to site slope, and 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 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 would add residential uses to a site with potential for subsurface contamination resulting from historic garage uses and/or fill material beneath the site. 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 Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I ESA would determine the potential for site contamination and level of exposure

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<sup>2</sup> Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

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 ESA 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 Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to demolition of buildings with asbestos-containing materials. In addition, because of its age (constructed prior to 1978), lead paint may be found in the existing building. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to the demolition of buildings that may contain lead paint.

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 Community Plan Evaluation (CPE), certification of an Environmental Impact Report (EIR), adoption of a Final Mitigated Negative Declaration, 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. **Rear Yard.** Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth at all levels of the building that include residential dwelling units. As proposed, rear yard open space has been provided at all residential levels of the proposed development. However, the proposed rear yard of 32 feet-7 inches only represents approximately 24 percent of the lot area. Please revise the proposal to include a 25% rear yard.
2. **Open Space – Residential.** Section 135 requires 36 square feet of private open space for each dwelling unit or shared, common open space in the amount of 48 square feet per dwelling unit. Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). The

proposed common space on the second floor meets the 15-foot minimum dimension or the "Inner Court" minimum dimensions. Balconies on the O'Farrell Street elevation are subject to design review for compatibility with the character-defining features of the Uptown-Tenderloin National Register District. The proposed project includes 28 dwelling units with private decks or balconies, and common open space of approximately 3,900 square feet (level 2 & roof) to be shared between the remaining 87 dwelling units. As proposed, the project appears to be deficient in common open space. Based on the 87 units that do not have a private patio or balcony, 4,176 square feet of common open space would be required.

3. **Open Space – Non-Residential.** Section 135.3 requires this project to provide one foot of open space for every 250 square feet of retail (and similar) uses. The proposal includes 1,442 square feet of commercial space. Therefore, 6 square feet of open space would be required. Alternatively, per Section 426, an in-lieu fee of \$76 per square foot may be paid instead of providing the open space on site.
4. **Streetscape and Pedestrian Improvements.** Section 138.1 requires one street tree for each 20 feet of Street frontage of the property containing the development project, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. Any existing street trees located within the public right-of-way along such property that have been protected during construction and that the Director does not recommended for removal, shall count toward meeting the requirement. The project street frontage of 87.75 feet requires four new street trees. Further information on tree planting requirements may be found at the following Department of Public Works website: <http://sfpublicworks.org/trees>. Through the city's Vision Zero efforts, O'Farrell Street has been identified as a pedestrian high injury corridor in need of safety improvement. The Street Design Advisory Team may have further comments regarding overall public realm improvements following review of the project submittal.
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. The proposed 24% rear yard is not code-complying and does not provide a large enough courtyard to meet the exposure requirement for those units that only have windows fronting the rear yard area. Therefore, the proposed project requires revision to meet the minimum exposure requirement, or you may request and justify an exposure exception through the variance process. The Department generally encourages projects to minimize the number of units needing an exposure exception.
6. **Shadow Analysis (Section 295).** Section 295 requires that a shadow analysis must be performed to determine whether the project has the potential to cast shadow on properties under the jurisdiction of the San Francisco Recreation and Park Commission. As noted above, under Environmental Review Item 9, Department staff has prepared a preliminary shadow fan that indicates the project does not cast new shadow on properties under the jurisdiction of the San Francisco Recreation and Park Commission.

7. **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 over 10 new dwelling units that are subject to the ordinance, and thus is subject to the TDM Program. Based on the proposed 21 parking spaces associated with the Residential Use, the project will be required to meet or exceed a target score of 14 points for land use category C - Residential.

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% of its target score. The project proposal appears to need additional features/points to bring it into compliance with the current requirements of the TDM Program. Please be aware that revisions to the project may result in the need to revise the project's TDM Plan as well.

8. **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, Department of Public Works and the Municipal Transportation Agency 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 project because it proposes new construction. A 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. 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.

9. **Street Frontages.** Pursuant to Section 145(c)(2), no more than one-third of the width or 20 feet, whichever is less, of any given street frontage shall be devoted to vehicular access. As proposed, the project devotes approximately 14 feet of frontage to off-street parking / loading access, which is within the dimensional thresholds of Section 145(c)(2). Driveways crossing sidewalks shall be no wider than necessary for ingress and egress, and shall be arranged, to the extent practical, so as to minimize the width and frequency of curb cuts, to maximize the number and size of on-street parking spaces available to the public, and to minimize conflicts with pedestrian and transit movements.
10. **Parking Above Grade and F.A.R.** Section 102 requires that the area of any vehicle parking located above grade be counted as part of the project's total Gross Floor Area, for the purposes of calculating the project's F.A.R. Spaces dedicated to car-sharing use are exempt from F.A.R. calculations.

11. **Off-Street Loading.** Section 152 requires that buildings with occupied floor area of 100,001 - 200,000 sf allow for one off-street freight loading space. As proposed, the project is lacking one required off-street loading space.
12. **Bicycle Parking (Class 1).** Planning Code Section 155 requires this project to provide at least 93 Class 1 bicycle parking spaces. The proposed project meets the Class 1 bicycle parking requirement. Please also reference the Transportation Demand Management comments to ensure the required target points are being met.
13. **Bicycle Parking (Class 2).** Planning Code Section 155 requires the project to provide at least 7 Class 2 bicycle parking spaces (5 for the residential density; 2 for the retail sf) 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 the 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>. Please also reference the Transportation Demand Management comments to ensure the required target points are being met.
14. **Car Sharing.** Planning Code Section 166 requires this project to provide at least one car share space. The proposed project contains one car share space, in conformance with Section 166. Please also reference the Transportation Demand Management comments to ensure the required target points are being met.
15. **Parking Costs.** Planning Code Section 167 states that all off-street parking spaces accessory to residential uses in new structures of 10 dwelling units or more shall be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units. In cases where there are fewer parking spaces than dwelling units, the parking spaces shall be offered first to the potential owners or renters of three-bedroom or more units, second to the owners or renters of two bedroom units, and then to the owners or renters of other units. Renters or buyers of on-site inclusionary affordable units provided pursuant to Section 415 shall have an equal opportunity to rent or buy a parking space on the same terms and conditions as offered to renters or buyers of other dwelling units, and at a price determined by the Mayor's Office of Housing, subject to procedures adopted by the Planning Commission notwithstanding any other provision of Section 415et seq. Per Section 167(b), the Planning Commission may grant an exception from this requirement for projects which include financing for affordable housing that requires that costs for parking and housing be bundled together.
16. **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

17. **Stormwater.** If the project results in a ground surface disturbance of 5,000 sf 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.
18. **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).
19. **Non-Potable Water Reuse.** Beginning November 1, 2016, all new buildings of 250,000 square feet or more of gross floor area, must install non-potable water reuse systems to treat and reuse available alternate water sources for toilet and urinal flushing and irrigation. The proposed project is less than 250,000 SF, but greater than 40,000 SF, so would be required to complete and submit a water balance study. For more information about the requirements, please visit <http://www.sfwater.org/np> and/or contact [nonpotable@sfwater.org](mailto:nonpotable@sfwater.org) for assistance. Non-potable water systems may be designed to optimize co-benefits for stormwater management, living roofs, and streetscape greening. Regardless of size, project sponsors are encouraged to consider a district-scale system that serves an entire larger

project and/or connects smaller projects with adjacent development through shared systems to maximize efficiency and effectiveness.

20. **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 requires between 15% and 30% of roof space to incorporate solar (photo voltaic 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% 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/san-francisco-living-roofs>.
21. **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 (GBC). Per the GBC, 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% 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.
22. **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.

#### PRELIMINARY DESIGN COMMENTS:

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

1. **Historic District.** The project site is located within an identified historic district; therefore, the proposed project is subject to further design review by the Department's Historic Preservation staff.