



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: December 21, 2017
TO: Taylor Dearing, David Baker Architects.
FROM: Debra Dwyer, Planning Department
RE: Case No. 2017-012580PPA
921-925 O'Farrell Street

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

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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, to answer any questions you may have, or to schedule a follow-up meeting.



Debra Dwyer, Environmental Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: December 21, 2017
Case No.: **2017-012580PPA**
Project Address: 921-925 O'Farrell Street
Block/Lot: 0718/020
Zoning: RC-4 Residential-Commercial, High Density
Van Ness Special Use District
Van Ness Automotive Special Use District
130-V Height and Bulk District
Project Sponsor: Taylor Dearing - Db Architects
415-967-7536
Staff Contact: Julie Moore – 415-575-8733
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 September 28, 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, and federal regulations as of the date of this document, all of which are subject to change.

PROJECT DESCRIPTION:

The proposal is to demolish the existing, two-story, 4,800-square-foot (sf) commercial/office building and construct a 15-story, 150-foot-tall mixed use building. The existing building on the 4,795-sf subject lot was constructed in 1927. The proposed new building would include 51 dwelling units (25 two-bedroom units, 25 studios, and one penthouse) with 1,079 sf of commercial space along O'Farrell Street and a residential

lobby on Olive Street. The project would require excavation of up to 9 feet in depth and the removal of approximately 21,000 cubic yards of material.

PRELIMINARY PROJECT COMMENTS:

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

HOME-SF. 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 Department supports the project sponsor's use of the HOME-SF program to maximize the amount of housing achievable on this site while providing 30 percent on-site affordable units. In accordance with recently updated Director's Bulletin #2, this project would be eligible to receive priority processing. (http://default.sfplanning.org/publications_reports/DirectorsBulletin02.pdf)

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.¹ 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.

- Dimensions of existing and proposed sidewalks and curb cuts to be removed
- Construction equipment list and construction schedule
- Wind study scope of work for department approval
- Shadow study scope of work for department approval
- Geotechnical investigation and excavation information

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

- Phase I Environmental Site Assessment

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 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 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 existing building on the project site was previously evaluated in a historical resources survey and found ineligible for national, state, or local listing. Thus, the proposed project is not subject to review by the Department's Historic Preservation staff; no additional analysis of historic architectural resources is required.

Projects seeking approval under the HOME-SF program may not cause a substantial adverse change in the significance of an historic resource as defined by the California Code of Regulations, Title 14, Section 15064.5. Please note that if the project results in impacts to a qualifying historic resource as determined by the Environmental Review Officer, then the project would no longer be eligible for the HOME-SF program.

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. However, the project site is located on a high injury corridor as mapped by Vision Zero.² Planning staff have reviewed the proposed site plans and request the following additional information be submitted on the site plans with the EEA: dimensions of existing and proposed sidewalks, and dimensions of existing curb cuts to be removed.
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

² This document is available at: <http://www.sfmta.com/sites/default/files/projects/2015/vision-zero-san-francisco.pdf>.

construction schedule and indicate whether pile driving or other particularly noisy construction methods are required.

6. **Air Quality.** The proposed project, with 51 dwelling units, is below the Bay Area Air Quality Management District's (BAAQMD) construction and operation screening levels for criteria air pollutants.³ 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, 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.

In addition, the project site is not 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 and modeling of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. Given that the project site is not within an Air Pollutant Exposure Zone, no additional measures or analysis related to local health risks are anticipated. However, 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. Based on the proposed building height, it is likely to need an emergency diesel generator. 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.⁴ 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 project site is in the Van Ness Special Use District and is subject to Planning Code limits on ground-level wind speeds. A consultant-prepared wind tunnel analysis will be required to

³ BAAQMD, *CEQA Air Quality Guidelines*, May 2017, Chapter 3.

⁴ Refer to <http://sf-planning.org/consultant-sponsor-resources> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

determine project compliance with these Planning Code provisions. Additionally, ground-level wind speeds will be assessed as part of the project's environmental review. The consultant will be required to prepare a proposed scope of work for review and approval by the assigned Current Planning and Environmental Planning staff prior to proceeding with the analysis.

Projects seeking approval under the HOME-SF program may not alter wind in a manner that substantially affects public areas. Please note that if the project results in wind impacts that substantially affect public areas, as determined by the Environmental Review Officer, then the project would no longer be eligible for the HOME-SF program.

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 could cast shadows on Sergeant John Macaulay Park at the corner of O'Farrell and Larkin Streets, a Recreation and Park Commission property. The proposed project is also subject to Planning Code Section 295. For more information, see "Preliminary Planning Code and Procedural Requirements" below. The project sponsor is therefore required to hire a qualified consultant to prepare a detailed shadow study. The consultant must submit a Shadow Study Application, which can be found on the planning department's website (<http://sf-planning.org/permit-forms-applications-and-fees>). A separate fee is required. The consultant must also prepare a proposed scope of work for review and approval by Environmental Planning staff prior to preparing the analysis.

Projects seeking approval under the HOME-SF program may not create new shadow in a manner that substantially affects outdoor recreation facilities or public areas. Please note that if the project results in shadow impacts that substantially affect an outdoor recreation area or other public area, as determined by the Environmental Review Officer, then the project would no longer be eligible for the HOME-SF program.

10. **Geology.** 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 geotechnical report 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 project site is not identified on the Maher map; however, the vicinity contains vehicle repair uses and potential underground storage tank sites, and the proposed project would excavate more than 50 cubic yards of soil. Therefore, the project may be 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 risk associated with the project. Please provide a copy of the Phase I ESA with the EEA. Based on the findings of the Phase I ESA, the sponsor may be subject to the Maher Ordinance and 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>.

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.

Further, prior to demolition, the project sponsor must ensure that any equipment containing polychlorinated biphenyls (PCBs) or di(2-ethylhexyl) phthalate (DEPH), such as fluorescent light ballasts, and any fluorescent light tubes containing mercury be removed and properly disposed of in accordance with applicable federal, state, and local laws. In addition, any other hazardous materials identified, either before or during work, must be abated according to applicable federal, state, and local laws.

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. **HOME-SF.** The project is seeking to use the HOME-SF program, which allows for two additional stories of height and a relief from density limits in exchange for 30 percent onsite affordability. In order to be eligible for the development bonuses and zoning modifications awarded by HOME-SF, the project must be located within an eligible district and must also incorporate specific project features.

- **Density.** The HOME-SF must include at least 135% of the base density as calculated in Planning Code Section 206.3. The residential Floor Area Ratio (FAR) is equivalent to a density control for purposes of HOME-SF. The Van Ness Special Use District provides a basic floor-area-ratio limit of 7.0 to 1 in the 130-foot height district. With a lot size of 4,795 square feet, the FAR should include at least 135% of the density in order to be eligible for the HOME-SF program.
 - **Affordability.** The proposed project satisfies the affordability requirements of the HOME-SF program by providing at least 30% affordable units on site.
 - **Dwelling Unit Mix.** The proposed project delivers units appropriate for families by providing at least 40% of the units that are two bedrooms or larger. However, the proposed project does not satisfy the unit mix as required by participation in the HOME-SF program in that at least 10% of the units must have 3 or more bedrooms. The current proposal only provides 2 bedroom units, studios, and a penthouse unit. Please revise for compliance. Alternatively, the dwelling unit mix can be satisfied by having at least 50% of the bedrooms in the building in units with more than one bedroom.
 - **Minimum Unit Sizes.** All of the affordable units in a HOME-SF project shall be no smaller than the minimum unit sizes set forth by the California Tax Credit Allocation Committee as of May 16, 2017, which are as follows:
 - Studio: 200 square feet
 - 1BR: 450 square feet
 - 2BR: 700 square feet
 - 3BR: 900 square feet
 - **Commercial Use.** The HOME-SF program requires active ground floor uses at the same square footage as any neighborhood commercial uses to be demolished or removed from the site. The current subject site includes commercial use, which can be considered a Retail Sales and Service Use per Planning Code Section 102; please ensure the square footage of retail use being removed is at the same rate of retail sales and service use being provided on site.
 - **Historic Resource.** The proposed project cannot cause a substantial adverse change in the significance of an historic resource as defined by California Code of Regulations, Title 14, Section 15064.5 to be eligible to participate in the HOME-SF program.
 - **Shadow.** The proposed project cannot create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas to be eligible to participate in the HOME-SF program.
 - **Wind.** The proposed project cannot alter wind in a manner that substantially affects public areas.
2. **Rear Yard (Section 134).** Section 134 requires the project to provide a rear yard of at least 25 percent of the lot depth and in no case less than 15 feet at the first residential level and above. The HOME-SF program allows the required rear yard to be reduced to no less than 20% of the lot depth or 15 feet,

whichever is greater. In addition to the development bonuses that the project may request under Section 206.3(d), the Planning Commission may grant minor exceptions to the rear yard provisions of this Code. Such exceptions should only be granted to allow building mass to appropriately shift and respond to surrounding context, and only when the Planning Commission finds that such modification does not substantially reduce or increase the overall building envelope permitted by the HOME-SF Program, and is consistent with the Affordable Housing Bonus Design Guidelines. The current project does not comply with the rear yard requirements of HOME-SF. If the project cannot demonstrate that it is eligible for an exception from the Planning Commission, then the project must seek and justify a Rear Yard Variance from Section 134 of the Planning Code.

3. **Open Space – Residential (Section 135).** Section 135 requires 36 square feet of open space for each dwelling unit if the space being provided is private open space, and 48 square feet of open space if the space being provided is common open space. Additionally, any such open spaces must meet the dimensional requirements of Subsections (f) and (g). The proposed common roof deck must provide a minimum of 2,400 square feet of common space, and the private roof deck must provide a minimum of 36 square feet of open space to meet the minimum amount of usable open space and the minimum dimensions.

Dimensional Requirements: Private usable open space must have a minimum horizontal dimension of six feet and be a minimum of 36 square feet if located on a roof deck. Common usable open space must be at least 15 feet in every horizontal dimension and shall have a minimum area of 300 square feet.

The HOME-SF program allows up to a 5% reduction of required common open space if provided under Section 135, and may use another zoning modification to permit an additional 5% reduction of required common open space. In addition to the development bonuses that the project may request under Section 206.3(d), the Planning Commission may grant minor exceptions to the usable open space provisions of this Code. Such exceptions should only be granted to allow building mass to appropriately shift and respond to surrounding context, and only when the Planning Commission finds that such modification does not substantially reduce or increase the overall building envelope permitted by the HOME-SF Program, and is consistent with the Affordable Housing Bonus Design Guidelines. If the proposed project does not meet the minimum requirements for residential open space, the project sponsor may be eligible to seek an exception from the Planning Commission, or must seek and justify an Open Space Variance from Section 135 of the Planning Code.

4. **Streetscape Plan – Better Streets Plan Compliance (Section 138.1).** 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, San Francisco Public Works and the Municipal Transportation Agency that provides design guidance on private developments that impact the public right-of-way.

The proposed project does not trigger a Streetscape plan, but does trigger the addition of a street tree for every 20' of façade and fraction thereof (O'Farrell Street and Olive Street).

5. **Standards for Bird Safe Buildings (Section 139).** Section 139 requires projects with location-related or feature-related hazards satisfy standards to minimize bird mortality from circumstances that are known to pose high-risk to birds. The proposed project may pose feature-related hazards, please ensure measures are taken to satisfy feature-related standards. Please refer to the Standards for Bird-Safe Buildings : <http://sf-planning.org/standards-bird-safe-buildings>
6. **Dwelling Unit Exposure (Section 140).** 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. Given that Olive Street is at minimum 20 feet across, the proposed project appears to meet the minimum exposure requirement by having all units face a street right-of-way.
7. **Rooftop Screening (Section 141).** Be advised that rooftop mechanical equipment must be arranged so as not to be visible from any point at or below the roof level of the subject building.
8. **Active Uses (Section 145.1).** With the exception of space allowed for parking and loading access, building egress, and access to mechanical systems, space for active uses shall be provided within the first 25 feet of building depth on the ground floor and 15 feet on floors above from any façade facing a street at least 30 feet in width. As proposed, the commercial space fronting O'Farrell Street satisfies the Active Use requirement.
9. **Street Frontages (Section 145.1(c)(2)).** 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 does not devote any street frontage to off-street parking / loading access and is thus compliant with Section 145(c)(2).
10. **Ground Floor Ceiling Height (Section 145.1(c)(4)).** Section 145.1(c)(4) requires the ground-floor provide a minimum floor-to-floor height of 14 feet as measured from grade. As proposed, the Project appears to meet the minimum ground floor ceiling height as required.
11. **Parking and Curb Cuts (Section 151.1).** Section 151.1 requires any proposed parking greater than one car for each four dwelling units to meet the criteria of Subsection (g). As proposed, the Project does not devote any street frontage to off-street parking/loading access and is thus compliant with Section 151.1.
12. **Bicycle Parking – Class I (Section 155.2).** Planning Code Section 155.2 requires this project to provide Class 1 bicycle parking at a rate of one per dwelling unit. The proposed project includes 51 dwelling units, thus 51 Class 1 bicycle parking spaces are required, and none are provided. Therefore, the proposed project requires revision to meet the minimum bicycle parking requirement, or you may request and justify a Bicycle Parking Variance from Planning Code Section 155.2.

13. **Bicycle Parking – Class II (Section 155.2).** Planning Code Section 155.2 requires the project provide at least 2 Class II bicycle parking spaces provided through on-street bicycle racks; however, SFMTA has final authority on the type, placement and number of Class II bicycle racks within the public ROW. Prior to issuance of first architectural addenda, you will be required 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 II bike racks required by the Planning Code. The SFMTA bicycle parking guidelines can be found at: <https://www.sfmta.com/getting-around/bike/bike-parking>
14. **Car Sharing (Section 166).** Planning Code Section 166 requires this project to provide car share space if off-street parking is provided. The project as proposed does not provide off-street parking spaces, so car share parking is not required, but may be provided as a means to meet the Transportation Demand Management target score.
15. **Transportation Demand Management (TDM) Program (Section 169).** 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 51 dwelling units and thus is subject to the TDM Program. Based on the proposed number of zero parking spaces associated with the residential use, the project will be required to meet or exceed a target score of approximately 10 points for land use category C. This is dependent on the final dwelling unit mix and percentage of affordable housing provided at the various area median income (AMI) levels. 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.
16. **Review of Proposed Buildings and Structures in the Van Ness SUD (Section 253.2).** Section 253.2 states that in the Van Ness SUD, any new construction exceeding 50 feet in height shall be permitted only as a conditional use upon approval by the Planning Commission. Additionally, the Planning Commission may require that the permitted bulk and required setbacks of a building be arranged to maintain appropriate scale and maximize sunlight to narrow streets (rights-of-way 40 feet in width or narrower) and alleys. The proposed project is 150 feet in height, and therefore requires a Conditional Use Authorization per Planning Code Section 253.2.
17. **Height (Section 260).** Per Planning Code Section 260, the RC-4 Zoning District is limited in height to 130 feet measured at grade on one street frontage. Please indicate one street frontage (O'Farrell Street or Olive Street) for measurement of height at the centerline of the building. The HOME-SF program allows an additional 20 feet above the height limit for a total allowable height of 150 feet. The project appears to meet the minimum requirements with a proposed height of 150 feet.
18. **Bulk (Section 270).** The proposed project is within a V bulk district. Per Planning Code Section 270, the "V" bulk district limits the massing of new construction above 50 feet to a maximum horizontal dimension of 110 feet and a maximum diagonal dimension of 140 feet. For HOME-SF projects, the Bulk requirement is applied an additional two stories, or 20 feet, above the limit stated in the Code, or any new massing above 70 feet. It is unclear whether the proposal complies with the maximum

diagonal dimension. If not, per Planning Code Section 271, the project must seek Conditional Use Authorization from the Planning Commission for a bulk exception.

19. **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. Department staff has prepared a shadow fan that indicates the project may cast new shadow on Sergeant John Macaulay Park at the corner of O'Farrell and Larkin Streets. Therefore, a detailed shadow analysis would need to be prepared to determine if the project would create new shadow in that results in an adverse impact to Sergeant John Macaulay Park pursuant to Section 295. If this detailed shadow analysis finds that the project would cast shadow on Sergeant John Macaulay Park, the sponsor should explore sculpting of portions of the project to avoid casting new shadows on the park. Please note, that in order to participate in the HOME-SF program, the proposed project cannot create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.
20. **Wind.** The project site is in the Van Ness SUD. Pursuant to Planning Code Section 243(c)(15), the proposed project is subject to the following wind regulations: ground-level wind speeds shall not exceed the seating comfort criterion of 7 mph for more than 10 percent of the time year-round, shall not exceed the pedestrian comfort criterion of 11 mph for 10 percent of the time year-round, and shall not reach or exceed the wind hazard criterion of 26 mph for a single hour of the year. The Planning Commission may grant exceptions from the comfort criteria, but no exceptions from the wind hazard criterion may be granted. In order to demonstrate project compliance with the provisions of Section 243(c)(15), a wind tunnel test is required.

Please retain a consultant who is familiar with San Francisco's methodology to conduct the wind tunnel test. The consultant will be required to prepare a proposed scope of work for review and approval by the assigned Environmental Planning and Current Planning staff prior to proceeding with the wind tunnel test. Please see the topic of wind under the Environmental Review section of this PPA letter for additional information. Please note, in order to participate in the HOME-SF program the proposed project cannot alter wind in a manner that would substantially affect public areas.
21. **Vision Zero.** The project is located on a "high-injury corridor," identified through the City's Vision Zero Network. Specifically, O'Farrell Street is a high-injury pedestrian corridor; the 900 block of O'Farrell Street, is also in close proximity to the cyclist, pedestrian, and vehicle high injury network along Polk Street. The Sponsor is encouraged to incorporate pedestrian safety streetscape measures into the project.
22. **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

23. **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 for assistance.
24. **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.
25. **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% 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 as of 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/departments-publications>.
26. **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.

27. **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. 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:

Site Design, Massing and Open Space. The Department recommends enlarging the light well to respond to the adjacent neighboring light well.

Architecture. The Planning Department recommends responding to the proportions, patterns, and materials prevalent in the surrounding context. Limit the amount of glass on the façade and balcony guardrails. Because the property line side walls will be visible for the foreseeable future, design them with high-quality material(s) and detailing.

Vision Zero. In 2014, the City adopted the [Vision Zero Policy](#) which seeks to eliminate all traffic deaths in the City by 2024. The City subsequently established a network of Vision Zero Corridors which have higher rates of traffic-related injuries and fatalities compared to most San Francisco Streets. The City has determined that streets on the Vision Zero network should be prioritized for safety improvements especially those that improve the safety of vulnerable users like people walking and people on bikes.

The project is located on a "high-injury corridor," identified through the City's [Vision Zero Network](#). Specifically, O'Farrell Street is a high-injury pedestrian corridor; the 900 block of O'Farrell Street, is also just off the cyclist, pedestrian, and vehicle high injury network along Polk Street. The sponsor is encouraged to incorporate pedestrian safety streetscape measures into the project.

DEVELOPMENT FEES:

This project will be subject to various impact fees. Please refer to the [Planning Director's Bulletin No. 1](#) for an overview of Development Impact Fees, and to the Department of Building Inspection's [Development Impact Fee webpage](#) for more information about current rates. Please note that this list only reflects fees and requirements referenced in the Planning Code. For projects in ongoing plan areas (e.g. Central SoMa, the Hub, etc.) the below list may not accurately reflect all fees that may become applicable to this project.

Based on an initial review of the proposed project, the following impact fees, which are assessed by the Planning Department, will be required:

1. **Transportation Sustainability Fee (TSF) (\$411A)**
2. **Residential Child Care Impact Fee (\$414A)**

PLANNING DEPARTMENT APPROVALS:

The project requires the following Planning Department approvals. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

1. **Interdepartmental Project Review.** This review is required for all new construction that propose building eight (8) stories or more.
2. **Environmental Evaluation Application.**
3. **Conditional Use Authorization** per Planning Code Section 206.3 (HOME-SF program), Section 253.2 (above 50 feet height in Van Ness Special Use District), and Section 271 (bulk exception).
4. A **Variance Application** from the rear yard requirement (Section 134), usable open space requirement (Section 135), bicycle parking requirement (Section 155.2) may be required if the project is not eligible for specified exceptions from the Planning Commission. Only one application is required, but all requests and related findings should be addressed in the application materials.
5. A **Building Permit Application** is required for the proposed demolition and new construction on the subject property.

In order for Planning Department staff to accurately review projects in a timely manner, plan sets must be complete and thorough. All plans submitted as part of an entitlement or building permit application must meet the Department's [Plan Submittal Guidelines](#).

All applications 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 www.sfplanning.org. Building Permit Applications are available at the Department of Building Inspection at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND OUTREACH:

Project Sponsors are encouraged, and in some cases required, to conduct public outreach with the surrounding community and neighborhood groups early in the development process. Additionally, many approvals require a public hearing with an associated neighborhood notification. Differing levels of neighborhood notification are mandatory for some or all of the reviews and approvals listed above.

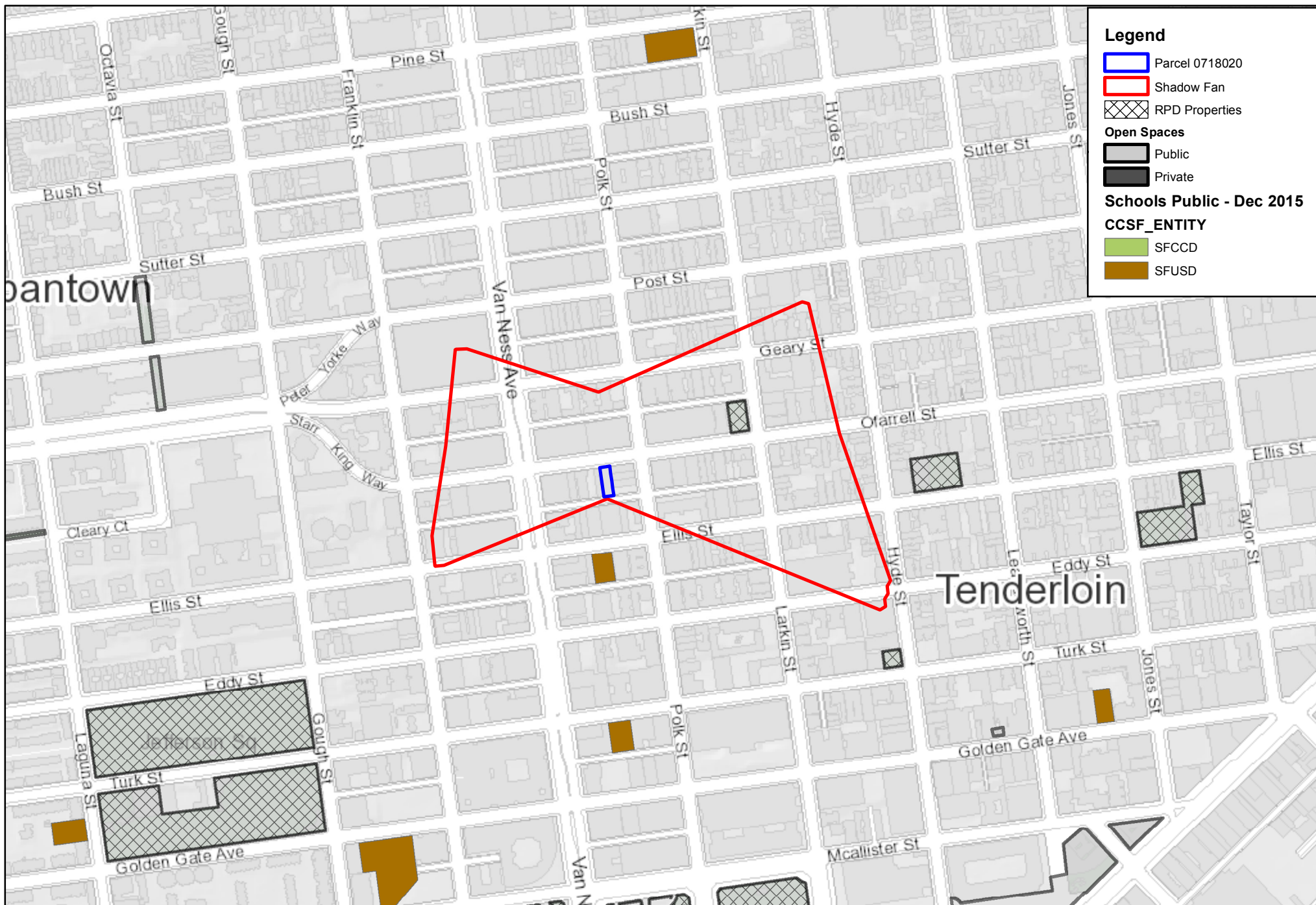
1. **Pre-Application Meeting.** This project is required to conduct a Pre-Application Meeting with surrounding neighbors and registered neighborhood groups before a development application may be filed with the Planning Department. The Pre-Application packet, which includes instructions and template forms, is available at <http://sf-planning.org/permit-forms-applications-and-fees> listed under "N" for Neighborhood Notification Pre-Application Meeting. The registered neighborhood group and organizations mailing list is available online at <http://sf-planning.org/department-publications> listed under "N".
2. **Notification of a Project Receiving Environmental Review.** Notice may be required to be sent to occupants of the project site and properties adjacent to the project site, as well as to owners and, to the extent feasible, occupants of properties within 300 feet of the project site at the initiation of the environmental review process. Please be prepared to provide mailing addresses on a CD upon request during the environmental review process.

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, Variance or Building Permit Application, as listed above, must be submitted no later than **June 21, 2019**. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Shadow Fan

cc: Roger and Michael Abuyaghi, Property Owner
Seema Adina, Current Planning
Julie Moore, Environmental Planning
Paolo Ikezoe, Citywide Planning and Analysis
Jonas Ionin, Planning Commission Secretary
Charles Rivasplata, SFMTA
Jerry Sanguinetti, Public Works
Pauline Perkins, SFPUC
Planning Department Webmaster (planning.webmaster@sfgov.org)



Title: 921-925 O'Farrell Street Preliminary Shadow Fan

Comments: 150 foot building. Modeled to 165 feet to include rooftop penthouse.

Printed: 31 October, 2017



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