



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

DATE: 12/27/17  
~~January 4, 2018~~

TO: Pam Robinson, Huntsman Architectural Group

FROM: Rick Cooper, Planning Department

RE: PPA Case No. 2017-012993PPA for 634 2nd St.

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

Reception:  
**415.558.6378**

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**415.558.6409**

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Please find the attached preliminary project assessment for the address listed above. You may contact the staff contact, Jeanie Poling, at (415) 575-9072 or [jeanie.poling@sfgov.org](mailto:jeanie.poling@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 "Rick Cooper".

Rick Cooper, Principal Environmental Planner



# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* December 27, 2017  
*Case No.:* **2017-012993PPA**  
*Project Address:* 634 2<sup>nd</sup> Street  
*Block/Lot:* 3788/038  
*Zoning:* MUO (Mixed Use-Office)  
65-X Height and Bulk District  
South End Landmark District  
*Area Plan:* Eastern Neighborhoods-East SoMa; proposed Central SoMa  
*Project Sponsor:* Pam Robinson, Huntsman Architectural Group  
415-394-1212  
*Staff Contact:* Jeanie Poling – 415-575-9072  
[jeanie.poling@sfgov.org](mailto:jeanie.poling@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 October 6, 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 add a two-story vertical addition to an existing three-story, 48,000-square-foot (sf), 48-foot-tall building that contains 47,044 sf of office use and 955 sf of ground floor retail use. The existing building on the 16,000 sf subject lot was constructed in 1927 and is a contributing resource to the South End Landmark District. The project would add 17,325 sf of office use and 3,178 sf of usable open space,

resulting in a 68,502 sf five-story building containing 64,369 sf of office use, 3,178 sf of open space, and 955 sf of retail use. No vehicle parking or loading spaces exist or are proposed, and there are no existing or proposed curb cuts along either street frontage.

The project site currently contains 18 Class 1 (indoor) bicycle parking spaces and no Class 2 (sidewalk) bicycle parking spaces; the project would add six Class 1 spaces and two Class 2 spaces (along 2nd Street), resulting in a total of 24 Class 1 bicycle parking spaces and two Class 2 bicycle parking spaces.

The project may require excavation for foundation support of the additional stories.

## BACKGROUND:

The proposed project is located within the Eastern Neighborhoods Area Plan, which was evaluated in the Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report (Eastern Neighborhoods PEIR), certified in 2008.<sup>1</sup> The project site also lies within the proposed Central SoMa Plan Area, a community planning process initiated in 2011. The draft Central SoMa Plan, released in August 2016, proposes changes to the allowed land uses and building heights in the plan area and a strategy for improving the public realm within the plan area and vicinity.<sup>2</sup>

The Central SoMa Plan Draft Environmental Impact Report (DEIR) was published on December 14, 2016.<sup>3</sup> Certification of the final EIR and approval of the plan are anticipated to be before decision-makers in 2018. The Central SoMa Plan does not propose to change the 634 2<sup>nd</sup> Street project site's zoning, height and bulk designations, or permitted uses, and the proposed project would not likely be affected by other changes included in the Central SoMa Plan, such as prohibition of lot mergers. Nonetheless, because it is unknown whether the draft Central SoMa Plan may be revised prior to approval by the Planning Commission and Board of Supervisors, the comments in this PPA that are related to the Central SoMa Plan are subject to change.

## PRELIMINARY PROJECT COMMENTS:

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

- 1. Eastern Neighborhoods Area Plan.** The subject property falls within the area covered by the Eastern SoMa subarea of the Eastern Neighborhoods Plan Area in the General Plan. As proposed, the project is generally consistent with the overarching objectives of the plan, though the project and design comments below discuss any items where more information is needed to assess conformity with either specific policies or Code standards or where the project requires minor modification to achieve consistency. The project sponsor is encouraged to read the full plan, which can be viewed at <http://generalplan.sfplanning.org/index.htm>.

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<sup>1</sup> Available at <http://sf-planning.org/area-plan-eirs>.

<sup>2</sup> Available at <http://sf-planning.org/central-soma-plan>.

<sup>3</sup> Available at <http://sf-planning.org/area-plan-eirs>.

2. **Central SoMa Area Plan.** The subject property falls within the ongoing Central SoMa plan area, generally bounded by 2nd Street to the east, 6th Street to the west, Townsend Street to the south, and an irregular border that generally jogs along Folsom, Howard, and Stevenson Streets to the north. A Draft Plan was published in April 2013, and a revised Draft Plan was published in August 2016. The Draft Plan has been evaluated in a draft environmental impact report (EIR), published in December 2016. The Draft Plan proposes changes to the allowed land uses, building heights, and bulk controls, and includes strategies for improving all the streets and sidewalks, increasing parks and recreational opportunities, and improving the neighborhood's environmental sustainability. The EIR, the Plan, and the proposed rezoning and affiliated Code changes are anticipated to be before decision-makers for approval in Spring 2018. The Draft Plan is available for download at: <http://centralsoma.sfplanning.org>

Further comments in this section of the PPA are based on the 2016 draft Central SoMa Plan and Implementation Strategy.

3. **Sustainability & Central SoMa Eco-District.** In San Francisco, an eco-district is a neighborhood or district where residents, community institutions, property owners, developers, businesses, City staff, and utility providers join together to establish and meet ambitious sustainability goals. By applying a comprehensive and systems-based approach to energy, water, air quality, greening, refuse, and more at the block or district scale, efforts can achieve greater effectiveness and efficiency than through building-by-building approaches. Each eco-district develops its own unique framework of objectives, policies, and implementation measures, driven by local opportunities and challenges. The eco-district construct aims for true sustainability, establishing clear and inspiring targets and enabling maximum innovation.

The Planning Department has identified the Central SoMa Plan Area as a Type 2 Eco-District—an infill area composed of new and existing development, smaller parcels, and multiple property owners. In Central SoMa, new development is uniquely positioned to exhibit a variety of sustainability best practices, including and beyond current City and State requirements. The anticipated value generation and optimal building typologies will help realize the healthy, climate positive, resource efficient, and resilient neighborhood envisioned. For example, new development in the Central SoMa Plan Area will use 100 percent GHG-free electricity, have 50 percent of roof areas dedicated to greening, and non-potable water for park irrigation and street cleaning. Its complete streets and sidewalks will be vibrant with pedestrians, bikes, transit, trees, and green stormwater infrastructure. Through the Central SoMa Plan, Eco-District Team and Guidebook, and additional technical studies, this Eco-District will serve as an example for other parts of the city. For more information, see Chapter 6 of the 2016 Draft Plan and Implementation Strategy.

4. **South End Landmark District.** The existing building is a contributing resource to the South End Landmark District. The proposed vertical addition must comply with the design guidelines and standards in Appendix I of Article 10 of the San Francisco Planning Code.

## 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.<sup>4</sup>

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.

- Historic resource evaluation report prepared by a professional selected from the Planning Department's historic resource consultant pool.
- Detailed information regarding proposed soils-disturbing activities, such as the depth, area and volume of excavation for foundation support.
- Preliminary geotechnical report with boring logs
- Phase I environmental hazardous materials reports prepared for the project to assist in this review
- Dimensions of existing sidewalks on site plans
- Documentation of enrollment in the Department of Public Health's Article 22A (Maher) program
- Phase I environmental site assessment (in electronic format only)
- Detailed information related to construction equipment, phasing and duration of each phase.
- Detailed information related to any proposed stationary sources of air pollutants, such as diesel generators or boilers.

### *Environmental Review Document- Community Plan Evaluation*

Section 15183 of the California Environmental Quality Act (CEQA) Guidelines states that projects that are consistent with the development density established by a community plan for which an environmental impact report (EIR) was certified do not require additional environmental review, except as necessary to determine the presence of project-specific significant effects not identified in the programmatic plan area EIR.

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<sup>4</sup> Available at [http://forms.sfplanning.org/Environmental\\_Evaluation\\_Application.pdf](http://forms.sfplanning.org/Environmental_Evaluation_Application.pdf).

As discussed above, the proposed project is located within the Eastern Neighborhoods Area Plan, which was evaluated in the Eastern Neighborhoods PEIR, and within the proposed Central SoMa Plan Area, which is currently being evaluated in the Central SoMa PEIR. The Central SoMa Plan Area will supersede the Eastern Neighborhoods Plan Area when it is in effect. If the proposed project is consistent with the development density identified in the area plan, it would be eligible for a community plan evaluation (CPE). Please note that a CPE is a type of streamlined environmental review. Proposed increases in project size or intensity after project approval beyond the CPE project description may require reconsideration of environmental impacts and issuance of a new CEQA determination.

Within the CPE process, there can be three different outcomes as follows:

1. **CPE.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the Eastern Neighborhoods PEIR, and there would be no new significant impacts peculiar to the proposed project or its site. In these situations, all pertinent mitigation measures and CEQA findings from the Eastern Neighborhoods PEIR are applied to the proposed project, and a CPE checklist and certificate is prepared. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,910) and (b) the CPE certificate fee (currently \$8,266).<sup>5</sup>
2. **Mitigated Negative Declaration.** If new site- or project-specific significant impacts are identified for the proposed project that were not identified in the *Eastern Neighborhoods PEIR*, and if these new significant impacts can be mitigated to a less-than-significant level, then a focused mitigated negative declaration is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts that were encompassed by the *Eastern Neighborhoods PEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods PEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,910) and (b) the standard environmental evaluation fee (which is based on construction value).
3. **Focused EIR.** If any new site- or project-specific significant impacts cannot be mitigated to a less-than-significant level, then a focused EIR is prepared to address these impacts, and a supporting CPE checklist is prepared to address all other impacts that were encompassed by the *Eastern Neighborhoods PEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods PEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$14,910); (b) the standard environmental evaluation fee (which is based on construction value); and (c) one-half of the standard EIR fee (which is also based on construction value). An EIR must be prepared by an environmental consultant from the Planning Department's environmental consultant pool.<sup>6</sup> The Planning Department will provide more detail to the project sponsor regarding the EIR process should this level of environmental review be required.

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<sup>5</sup> Available at <http://sf-planning.org/permit-forms-applications-and-fees>. Environmental fees are on page 2. In addition, see "miscellaneous fees" on page 4 for monitoring fees applicable to projects that require active monitoring of mitigation measures.

<sup>6</sup> Available at <http://sf-planning.org/consultant-sponsor-resources>.

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 subject property is a contributing property within the South End Landmark District, which is designated under Article 10 of the San Francisco Planning Code. The proposed construction is subject to review by the Department's Historic Preservation staff for analysis of the project's compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties and for compatibility with the district. To assist in this review, the project sponsor must hire a qualified professional to prepare a historic resource evaluation (HRE) report to assess the project's compatibility with the district. The professional must be selected from the Planning Department's historic resource consultant pool. Please contact Pilar LaValley, Senior Preservation Planner, via email ([pilar.lavalley@sfgov.org](mailto:pilar.lavalley@sfgov.org)) for a list of three consultants from which to choose. Please contact the 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 to the Planning Department after the project sponsor has filed the EEA and updated it as necessary to reflect feedback received in the PPA letter. The HRE should be submitted directly to the assigned environmental planner 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 the project until the complete draft HRE is received.

The proposed project also requires the review and approval of a Certificate of Appropriateness by the Historic Preservation Commission. The certificate of appropriateness application will allow preservation staff to review the proposed project for compatibility with the landmark district and for conformance with the Secretary of the Interior's Standards.

2. **Archeological Resources.** The project site lies within Archeological Mitigation Zone J-2: Properties with No Previous Studies of the Eastern Neighborhoods PEIR. If the project requires any soil disturbance (e.g., for foundation work), the 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 Department's 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 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. The Central SoMa Plan DEIR includes a similar mitigation measure:

M-CP-4a, Project-Specific Preliminary Archeological Assessment, which would apply to any project involving soils-disturbing or soils-improving activities to a depth of 5 feet or greater below ground surface, for which no archeological assessment report has been prepared.

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. The Central SoMa Plan DEIR includes Mitigation Measure M-CP-5a, Project-specific Tribal Cultural Resources Assessment, which applies to projects that require excavation to a depth of 5 feet or greater below ground surface, and may be applicable to the proposed project, depending on the proposed depth of excavation. 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 and initial review by transportation planners, a transportation impact study is not anticipated; an official determination will be made subsequent to submittal of the EEA. Please include dimensions of sidewalks on the site plan.
5. **Noise.** The proposed project would be subject to Eastern Neighborhoods PEIR Mitigation Measure F-2: Construction Noise, which requires that the project sponsor develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant when the environmental review of a development project determines that construction noise controls are necessary due to the nature of planned construction practices and sensitivity of proximate uses. This mitigation measure requires that a plan for such measures be submitted to DBI prior to commencing construction to ensure that maximum feasible noise attenuation will be achieved. The Central SoMa Plan DEIR contains a similar mitigation measure: M-NO-2a, General Construction Noise Control Measures, which would apply to the proposed project.
6. **Air Quality/Criteria Air Pollutants.** The project would add two stories (20,503 sf) to an existing three story (48,000 sf) building; this is below the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.<sup>7</sup> Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required. Please provide detailed information related to construction equipment, phasing and duration of each phase, and the volume of excavation as part of the EEA.

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<sup>7</sup> BAAQMD, CEQA Air Quality Guidelines, May 2011, Chapter 3.

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 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.

7. **Air Quality/Local Health Risks and Hazards.** 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 modeling of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. 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. Please provide detailed information related to any proposed stationary sources with the EEA.
8. **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>8</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.
9. **Wind.** The proposed project would not involve construction of a building over 80 feet in height. Therefore, a consultant-prepared wind analysis is not anticipated to be required.
10. **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 San Francisco Recreation and Parks property subject to Section 295 or other publicly accessible non-rec park properties, including schoolyards. Thus, no additional shadow analysis is required.
11. **Geology.** 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 preliminary geotechnical report with boring logs for the proposed project. This report will also help inform the Planning Department archeologist of the project site's subsurface geological conditions.

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<sup>8</sup> Available at <http://sf-planning.org/consultant-sponsor-resources>. See "Greenhouse Gas Compliance Checklist for Private Development Projects."

12. **Hazardous Materials.** The project site is in an area where hazardous substances may be present in the soil or groundwater (due to prior industrial use or within 100 feet of a current or former underground tank). If the project involves the disturbance of over 50 cubic yards of soil it would 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. 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.<sup>9</sup> Fees for DPH review and oversight of projects subject to the ordinance would apply. Please refer to DPH's fee schedule.<sup>10</sup> Please provide a copy of the submitted Maher application and Phase I ESA (in electronic format only) with the EEA.

13. **Disclosure Report for Developers of Major Projects.** San Francisco Campaign and Governmental Conduct Code Section 3.520 et seq. requires the developer of any project with estimated construction costs exceeding \$1,000,000 to submit a *Disclosure Report for Developers of Major City Projects* if the project requires the issuance of a CPE. The first (or initial) report must be filed within 30 days of the final environmental determination under CEQA. Please submit a *Disclosure Report for Developers of Major City Projects* directly to the San Francisco Ethics Commission.<sup>11</sup>

## 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. **Zoning & Height.** Within the existing MUO Zoning District, office uses are permitted per Planning Code Section 842. The proposed height of 65 feet would be permitted within the existing 65-X Height and Bulk District. The existing zoning and height controls are not proposed to change as part of the proposed Central SoMa Plan.
2. **Appendix I to Article 10 – South End Historic District.** Per Appendix I, additions to existing buildings should respect the general size, shape, and scale of features associated with the property and the district. As proposed, the solid-to-void ratio of the vertical addition does not relate to the existing building. Please revise the proposal to show compatibility with this requirement. Also, please submit sightline perspective drawings illustrating the proportionality and scale, as well as the visible extent of the addition from several vantage points

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<sup>9</sup> Available at <https://www.sfdph.org/dph/EH/HazWaste/hazWasteSiteMitigation.asp>.

<sup>10</sup> Available at <https://www.sfdph.org/dph/EH/Fees.asp#haz>.

<sup>11</sup> Available at <http://www.sfethics.org>.

3. **Proposition X (PDR Replacement).** Prop X was approved by voters in November 2016, with the aim of preserving production, distribution, and repair; institutional community; or arts activity uses in certain zoning districts. Per Planning Code Section 202.8, in the MUO Zoning District, a replacement of 0.75 sf of PDR, institutional community, or arts activities must be replaced for every 1 sf of existing PDR use that is converted or demolished. The existing property is a principally permitted office use pursuant to Variance No. 2000.1162V and Office Allocation No. 2000.1162B. Therefore, Prop X does not apply.
4. **Floor Area Ratio.** Per Planning Code Section 124, the maximum floor area ratio within a 65-foot height district is 5.0 to 1 within the MUO Zoning District. With a lot size of 16,000 sf, the project site's maximum floor area for a non-residential use is 80,000 sf. With a proposed 65,325 gross sf of non-residential use, the project complies with the FAR limits.
5. **Usable Non-Residential Open Space.** Planning Code Section 135.3 requires non-residential open space at a rate of 1 sf for every 50 sf of office use. With a proposed 17,325 gross sf of non-residential use, the project requires approximately 347 sf of open space. With a proposed 3,178 sf of open space, the project complies with the usable non-residential open space requirement.
6. **Shadow Analysis (Section 147).** Planning Code Section 147 requires that new buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts that exceed 50 feet shall be shaped to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Planning Code Section 295. A preliminary shadow study conducted by staff in conjunction with this PPA indicates that the project will not cast a shadow on any park or open space protected under Section 295.
7. **Bicycle Parking (Class 1).** Planning Code Section 155.2 provides requirements for bicycle parking. For office use, one Class 1 bicycle parking space is required for every 5,000 sf of occupied floor area. Based on the proposed 65,325 gross sf, the project requires 13 Class 1 Bicycle Parking spaces. Please show compliance with this requirement and provide the occupied floor area to determine the required bicycle parking.
8. **Bicycle Parking (Class 2):** Planning Code Section 155.2 requires the project to provide a minimum of two Class 2 bicycle parking spaces provided through on-street bicycle racks; however SFMTA has final authority on the type, placement, and number of Class 2 bicycle racks within the public ROW. Prior to issuance of first architectural addenda, you will be required contact the SFMTA Bike Parking Program at [bikeparking@sfmta.com](mailto:bikeparking@sfmta.com) to coordinate the installation of on-street bicycle racks and to ensure that the proposed bicycle racks meet the SFMTA's bicycle parking guidelines. Depending on local site conditions and anticipated demand, SFMTA may request that the project sponsor pay an in-lieu fee for Class 2 bike racks as 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>.

9. **Shower Facilities and Lockers.** Planning Code Section 155.4 requires the project to provide at least four showers and 24 clothes lockers where the occupied floor area exceeds 50,000 sf. The proposed project contains no shower facilities or lockers. Please show compliance with this requirement and show the occupied floor area to determine the required shower facilities and lockers.
10. **Transportation Demand Management 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 17,325 sf of office use and thus is subject to the TDM Program. The project will be required to meet or exceed a target score of 13 points for land use category B.

Please note that if the first development application – as defined in Planning Code Section 401 – is submitted by December 31, 2017, then the project will only be required to meet 75 percent of its target score. The Draft TDM Plan submitted appears to be in general compliance with the current requirements of the TDM Program. However, please be aware that additional review of the selected TDM Plan may be needed, and that revisions to the project may result in the need to revise the project's TDM Plan as well. More information on the TDM program and be found at <http://sf-planning.org/shift-transportation-demand-management-tdm>.

11. **Office Development Authorization.** Since the project would only construct an additional 17,325 sf, the project is NOT required to submit an Office Development Authorization per Planning Code Sections 320 and 321. The existing office use (consisting of 47,044 sf) has been in existence for more than 10 years, and a new office authorization is not required.
12. **Stormwater.** If the project results in a ground surface disturbance of 5,000 sf or greater (creating and/or replacing 5,000 sf 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.

13. **Better Roofs Ordinance.** In 2016, San Francisco became the first major city in the U.S. to require the installation of renewable energy facilities or living roofs on new buildings. The Better Roofs Ordinance will require between 15 and 30 percent of roof space to incorporate solar (photo voltaic 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 to best utilize rooftop space; ideally, projects should pursue holistic design and amenity enhancements for 100 percent of usable roof space that include open space, habitat, stormwater management, urban agriculture, and other beneficial uses. Please see the Planning Department's Living Roof Manual to learn more: <http://sf-planning.org/san-francisco-living-roofs>.
14. **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 percent GHG-free electricity. As with non-potable water systems, projects are recommended to consider district-scale energy options on site and in coordination with neighbors.
15. **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 to make these options 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:

### Massing and Open Space

Massing and setbacks of the proposed vertical addition and the locations of roof deck open spaces are generally compatible with the existing historic resource and with the South End Historic District context.

### Streetscape and Street Frontage

Due to the lack of detail provided in the existing ground floor and proposed street elevations, the street frontage (i.e., the interface between private and public realms at the ground floor) could not be evaluated. In general, the ground level façades should provide a welcoming public-private interface, and the length of ground floor façades occupied by non-active uses should be minimized. Please provide more detailed proposed ground floor plan and elevations with future submittals.

### Architecture

The level of architectural detail provided in the submission is preliminary. Further design review will be provided on subsequent submissions; however, in general the façades should express significant depth, feature high-quality materials, and reflect the architectural detailing and character of the district as well as the Secretary of the Interior's Standards for Rehabilitation work to the existing building. If renovation of the historic resource is undertaken:

- Repair, repaint and/or replace existing historic windows in-kind.
- Replace existing non-historic windows on the ground floor with windows that reference the historic mullion patterns.
- Locate and size any new openings on the façade in a manner that is complimentary to the scale, pattern, and detailing of existing openings.
- Incorporate exterior and ambient lighting that highlights the historic features of the building.
- Retain existing columns at the interior of the buildings, and use the existing structural grid to organize both the reuse of the existing building and the new vertical addition, where feasible. The existing building and vertical addition should be spatially, as well as visually, integrated.

The architecture of the proposed vertical addition should read as evidently distinct from *and* complimentary to the historic resource. The addition should take architectural references and visual cues from the existing structure and from the character-defining elements of the South End Historic District, and reinterpret these elements in a contemporary language. Façade treatment should reference the materials, color palate, fenestration rhythm, proportion, and other design features of the existing building and historic district, including:

- *Scale and Proportion.* Typically warehouse scale, large in bulk, often with large openings, and regularity of overall form.
- *Fenestration.* Windows are varied in size, rhythmically spaced, deeply recessed, producing a strong shadow line, and related in shape and proportion to those in nearby buildings. Larger industrial sash windows began to be incorporated in structures built from the 1920s and onward. Door openings are often massive to facilitate easy access of bulk materials.
- *Material and Color.* Standard brick masonry is predominant for the oldest buildings in the district, with reinforced concrete introduced after the 1906 fire. Red brick is typical, with some yellow and painted brick. Muted earth tones predominate in shades of red, brown, green, gray and blue.
- *Texture.* Typical facing materials give a rough textured appearance. The overall texture of the façades is rough-grained.
- *Detail.* Cornices are simple and generally tend to be abstract versions of the more elaborate cornices

found in downtown commercial structures from the nineteenth century. Most of the surfaces of the later buildings are plain and simple, reflecting their function. Some of the earlier brick work contains suggestions of pilasters, again highly abstracted. Where detail occurs, it is often found surrounding entryways.

Given the character-defining features of the existing building and the historic district, the vertical addition should feature fenestration with a higher proportion of mass-to-void, deeply recessed openings and vertical proportions.

NOTE: The proposed windows shown along the property line with 640 2<sup>nd</sup> Street could be blocked in the future if a vertical addition is undertaken on this adjacent site.

### 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. Because this project is in the proposed Central SoMa Plan Area, the list below 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:

- Transportation Sustainability Fee (TSF) (Planning Code Section 411A)
- Eastern Neighborhoods Impact Fees (Planning Code Section 423)

### 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. A **certificate of appropriateness** application is required for the proposed vertical addition to the existing three-story historic building per Planning Code Section 1006.
2. A **building permit application** is required for the proposed vertical addition to the existing building.

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](http://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.

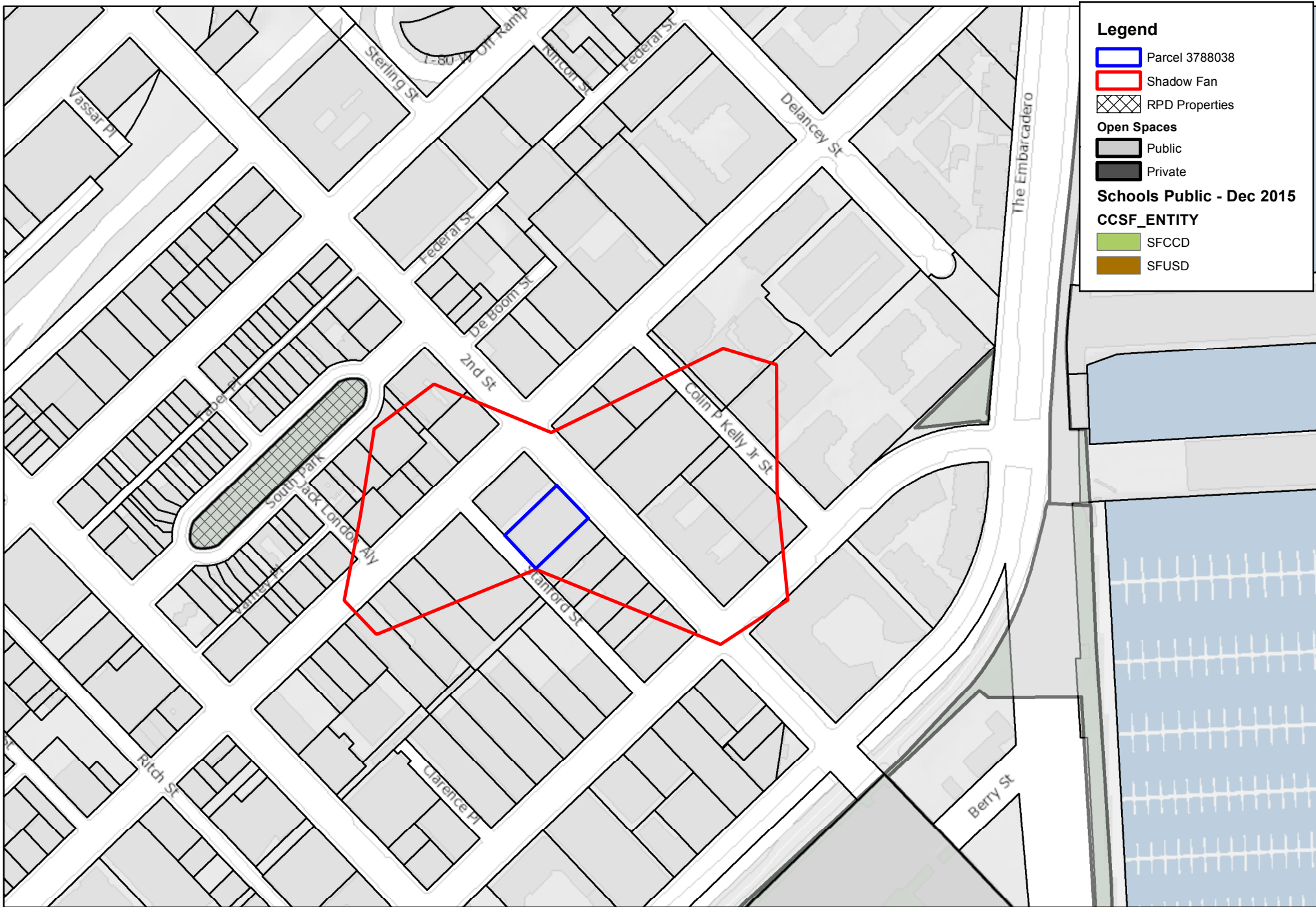
1. **Pre-Application Meeting.** This project is required to conduct a pre-application meeting with surrounding neighbors and registered neighborhood groups before a development application may be filed with the Planning Department. The pre-application packet, which includes instructions and template forms, is available at [www.sfplanning.org](http://www.sfplanning.org) under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at [www.sfplanning.org](http://www.sfplanning.org) under the "Resource Center" tab.
2. **Neighborhood Notification:** The project is located within the Eastern Neighborhoods Mixed Use District and requires neighborhood notification to owners and occupants within 150 feet of the project site prior to approval of the site permit, in accordance with Planning Code Section 312.

**PRELIMINARY PROJECT ASSESSMENT EXPIRATION:**

This preliminary project assessment is valid for a period of **18 months**. An environmental evaluation, certificate of appropriateness, or building permit application, as listed above, must be submitted no later than **June 27, 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: preliminary shadow fan

cc: Thor 634, LLC, property owner  
Natalia Kwiatkowska, Current Planning  
Jeanie Poling, Environmental Planning  
Maggie Wenger, 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](mailto:planning.webmaster@sfgov.org))



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Comments: N/A

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