DATE: May 24, 2018
TO: William Mollard, Workshop1
FROM: Rich Sucre, Planning Department
RE: Case No. 2018-002951PPA for 1111 Pennsylvania Avenue

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Doug Vu, at (415) 575-9120 or Doug.Vu@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

[Signature]
Rich Sucre, Senior Planner
Preliminary Project Assessment

Date: May 24, 2018
Case No.: 2018-002951PPA
Project Address: 1111 Pennsylvania Avenue
Block/Lot: 4291/015
Zoning: PDR-2 (Core Production, Distribution and Repair) Zoning District
Industrial Protection Zone Special Use District
65-J Height and Bulk District
Area Plan: N/A
Project Sponsor: William Mollard
(415) 523-0304
Staff Contact: Doug Vu – (415) 575-9120
Doug.Vu@sfgov.org

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 February 27, 2018, 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 remove all existing shipping containers on the 38,289 square feet (sq. ft.) project site and construct a five-story, 65-feet tall and approximately 187,126 sq. ft. industrial building over basement containing 2,500 sq. ft. of ground floor Retail Sales and Service use, 160,230 sq. ft. of Production, Distribution and Repair with accessory Office use(s), and 31,214 sq. ft. of underground accessory parking...
for 74 automobiles. The project site has street frontage measuring 200 ft. on 25th Street and 168 ft. on Pennsylvania Avenue, and is currently used as public storage facility (dba California Mini Storage). The proposed development is located in the Potrero Hill neighborhood and is adjacent to the Pennsylvania Avenue on-ramp to southbound Interstate 280.

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 must be submitted subsequent to issuance of the PPA letter, and must include the required information specified in this PPA letter.

The environmental review may be done in conjunction with the required Planning Department Approvals, listed below, but must be completed before any project approval may be granted. 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 draft 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:

- Provide detailed information, including sections, proposed soils-disturbing activities (such as grading, excavation, installation of foundations, and soils improvement), and site remediation in the EEA.
- Identify noisy uses or equipment anticipated to be used in operations.
- Provide a construction schedule, and indicate whether pile driving or other particularly noisy construction methods would be required.
- Provide a Phase I Environmental Site Assessment (ESA).
- Provide proof that a Maher Application has been submitted to the Department of Public Health.
- Provide a geotechnical report.
- Provide detailed information related to construction equipment, phasing and duration of each phase, and the volume of excavation as part of the EEA.
- Indicate in EEA if a back-up diesel generator would be used in the operation of the proposed project.

\(^1\) San Francisco Planning Department. Fee Schedule for Application Fees. Available online at: http://sf-planning.org/permit-forms-applications-and-fees.
• Show the dimensions of existing and proposed sidewalks and curb cuts on plans, including compliance with Better Streets Plan requirements. Provide a site plan with transportation elements and dimensions of impact on public property or rights(s)-of-way.

• Clarify vehicle parking access and number of proposed parking spaces on plans.

• Provide a detailed shadow study, the scope of which should be coordinated with Planning Department staff.

Environmental Review Document

The project could result in a significant impact as a result of the project site’s location with an Air Pollutant Exposure Zone. Therefore, an initial study is likely required. The initial study may be prepared either by an environmental consultant from the Department’s environmental consultant pool or by Department staff. Should you choose to have the initial study prepared by an environmental consultant, contact Jessica Range at (415) 575-9018 for a list of three eligible consultants. If the initial study finds that the project would have a significant impact that could be reduced to a less-than-significant level by mitigation measures agreed to by the project sponsor, then the Department would issue a preliminary mitigated negative declaration (PMND). The PMND would be circulated for public review, during which time concerned parties may comment on and/or appeal the determination. If no appeal is filed, the Planning Department would issue a final mitigated negative declaration (FMND). Additional information regarding the environmental review process can be found at: http://sf-planning.org/environmental-review-process.

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

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

1. Historic Resources. The subject property is a vacant lot located in an area that has not been previously surveyed. However, the property is located across the street from an eligible historic resource, the Bridges and Tunnels National Register Historic District. The Department’s Historic Preservation staff will review the proposed project in coordination with the Urban Design Advisory Team (UDAT). A Historic Resource Evaluation (HRE) report is not required.

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 one of the Planning Department’s three standard archeological mitigation measures (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 Planning Department’s Transportation Impact Analysis Guidelines for Environmental Review, the project would require additional transportation analysis to determine whether the project may result in a significant transportation impact, and Transportation Planner coordination is likely required for this project. Based on the PPA submittal, a transportation impact study is not anticipated; an official determination will be made subsequent to submittal of the EEA. The transportation planner would provide coordination on the design of the proposed driveway, loading configuration, and coordination with other agencies.

The Planning Department further requires that the project sponsor provide the following information in the EEA: show the dimensions of existing and proposed sidewalk and curb cuts on plans, including compliance with Better Streets Plan requirements, and clarify vehicle parking access and number of proposed parking spaces on plans.

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, depending upon further examination of the proximity of the project in relation to uses sensitive to noise, measures to reduce construction noise may be required as part of the proposed project. The EEA should provide a construction schedule and indicate whether pile driving or other particularly noisy construction methods are required.

---

Operation of the proposed project’s industrial and PDR uses may generate noise that could result in a substantial permanent increase in ambient noise levels. Depending upon further examination of the project and proximity of the project in relation to uses sensitive to noise, the proposed project may require a noise study that includes at a minimum: measurements of the existing noise environment, discussion of applicable noise regulations, analysis of the project’s noise effects and the ability of noise sources to meet applicable noise standards. Please include in the project description, the types of industrial and PDR uses you expect to be operating in this building. If a noise study should be required, it shall be conducted by a qualified acoustical consultant who shall prepare a noise study scope of work for approval by the assigned environmental coordinator prior to conducting the study.

6. Air Quality.
Criteria Air Pollutants. The proposed project at 105,000 square feet industrial/PDR and 2,500 square feet commercial/retail is below the Bay Area Air Quality Management District’s (BAAQMD) construction and operational screening levels for criteria air pollutants. 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.

In addition, project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the proposed project will be required to adhere to the dust control requirements set forth in the Construction Dust Ordinance contained in San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6. The proposed project site is more than ½ acre, and therefore is also required to prepare a Construction Dust Control Plan for review and approval by the San Francisco Department of Public Health (DPH).

Local Health Risks and Hazards. The project site is located within an Air Pollutant Exposure Zone, as mapped and defined by Health Code Article 38. The Air Pollutant Exposure Zone identifies areas with poor air quality based on modeling of air pollution, exposures, and health vulnerability from mobile, stationary, and area source emissions within San Francisco. Therefore, equipment exhaust measures during construction will likely be required.

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

7. Greenhouse Gases. The City and County of San Francisco’s Strategies to Address Greenhouse Gas Emissions presents a comprehensive assessment of policies, programs, and ordinances that represents San Francisco’s Qualified Greenhouse Gas (GHG) Reduction Strategy. Projects that are consistent with San Francisco’s Qualified GHG Reduction Strategy would result in less-than-significant impacts from GHG emissions. In order to facilitate a determination of compliance with San Francisco’s Qualified GHG Reduction Strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance
The project sponsor may be required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco’s Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.

8. **Wind.** The proposed project would not involve construction of a building over 80 feet in height. Therefore, a consultant-prepared wind analysis is not anticipated to be required.

9. **Shadow.** The proposed project would result in construction of a building greater than 40 feet in height. A preliminary shadow fan analysis prepared by Planning Department staff indicates that the proposed project would cast a shadow on Tunnel Top Park, a publicly accessible non-Recreation and Park Department property. 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.

10. **Geology.** The proposed project site includes a greater than 20% slope. Any new construction on the site is therefore subject to a mandatory Interdepartmental Project Review. A geotechnical study prepared by a qualified consultant must be submitted with the EEA. The study should address whether the site is subject to landslide, and should provide recommendations for any geotechnical concerns identified in the study. In general, compliance with the building codes would avoid the potential for significant impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement. To assist Planning Department staff in determining whether the project would result in environmental impacts related to geological hazards, it is recommended that you provide a copy of the geotechnical information with boring logs for the proposed project. This study will also help inform the Planning Department Archeologist of the project site’s subsurface geological conditions.

11. **Hazardous Materials.** The proposed project is located on a known leaking underground storage tank cleanup site (closed in 1991) and will likely excavate more than 50 cubic yards of soil. Therefore, the project is subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I ESA would determine the potential for site contamination and level of risk of exposure 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.

---

3 Refer to [http://sf-planning.org/consultant-sponsor-resources](http://sf-planning.org/consultant-sponsor-resources) for latest “Greenhouse Gas Compliance Checklist for Private Development Projects.”

4 San Francisco Planning Department. **Interdepartmental Project Review.** Available online at: [http://sf-planning.org/permit-forms-applications-and-fees](http://sf-planning.org/permit-forms-applications-and-fees)
DPH requires that projects subject to the Maher Ordinance complete a Maher Application, available at: http://www.sfdph.org/dph/EH/HazWaste/hazWasteSiteMitigation.asp. The project sponsor must submit the Article 38 (Maher) application to DPH prior to the issuance of any environmental determination. Please provide proof of the initial application. Fees for DPH review and oversight of projects subject to the ordinance would apply. Please refer to DPH’s fee schedule, available at: http://www.sfdph.org/dph/EH/Fees.asp#haz. Please provide a copy of the submitted Maher Application and Phase I ESA with the EEA.

Because the existing buildings may have been constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. The Bay Area Air Quality Management District (BAAQMD) is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to demolition of buildings with asbestos-containing materials. In addition, because of its age (constructed prior to 1978), lead paint may be found in the existing building. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to the demolition of buildings that may contain lead paint.

12. Naturally Occurring Asbestos. Based upon mapping conducted by the U.S. Geological Survey (USGS) the project site may be underlain by serpentine rock. Project construction activities could release serpentine into the atmosphere. Serpentinite commonly contains naturally occurring chrysotile asbestos (NOA) or tremolite-actinolite, a fibrous mineral that can be hazardous to human health if airborne emissions are inhaled. In the absence of proper controls, NOA could become airborne during excavation and handling of excavated materials. On-site workers and the public could be exposed to airborne asbestos unless appropriate control measures are implemented. To address health concerns from exposure to NOA, the California Air Resources Board enacted an Asbestos Airborne Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations in July 2001. The requirements established by the Asbestos ATCM are contained in California Code of Regulations (CCR) Title 17, Section 93105, and are enforced by the Bay Area Air Quality Management District (BAAQMD). The proposed project would be required to comply with the requirements of the Asbestos ATCM, which include measures to control fugitive dust from construction activities, in addition to the requirements of the Construction Dust Control Ordinance discussed above.

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 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

---

5 Planning Department, GIS Layer, “Areas Affected by Serpentine Rocks.” Created February 25, 2010 from United States Geological Survey and San Francisco Department of Public Health data.

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. **Industrial Protection Zone SUD.** The project site is located in the Industrial Protection Zone SUD under Planning Code Section 249.22. Within this SUD, the provisions of the M-1 and M-2 use districts established by Section 201 shall prevail except for housing and non-accessory office space. The proposal is to construct a building for PDR use, which is a broad grouping of uses that may be principally permitted (P), conditionally permitted (C), or not permitted (NP). Therefore, a Conditional Use Authorization may be required depending on the proposed use(s) under these provisions.

2. **Office Development Authorization.** Pursuant to Planning Code Sections 320-322, an Office Development Authorization is required to create 25,000 sq. ft. or more of accessory or principal office space. Office uses applicable to this Section include, but are not limited to, professional; banking; insurance; management; consulting; technical; sales and design; and the office functions of manufacturing and warehousing businesses. Office uses not applicable to this Section include retail use; repair; any business characterized by the physical transfer of tangible goods to customers on the premises; wholesale shipping, receiving and storage; any facility, other than physicians’ or other individuals’ offices and uses accessory thereto, customarily used for furnishing medical services; and design showcases or any other space intended and primarily suitable for display of goods.

3. **Permitted Obstructions.** Please include detailed and scaled floor plans with your entitlement application to determine if the proposed fenestration and/or other features comply with Planning Code Section 136.

4. **Streetscape Plan.** Pursuant to Planning Code Section 138.1, the proposal meets the criteria that require the preparation of a comprehensive streetscape plan in compliance with the adopted Better Streets Plan. Please see the comments under Preliminary Design Comments below.

5. **Better Roofs/Living Roof Alternative.** Please designate the minimum 15% roof area that is required to be designated as solar-ready on your entitlement application plans, which can also be satisfied through a living roof alternative, pursuant to Planning Code Section 149.

6. **Off-Street Loading.** Please identify the three required loading spaces on your entitlement application plans that comply with the dimensions under Planning Code Section 154.

7. **Bicycle Parking.** Please identify the proposed 14 Class 1 and 6 Class 2 bicycle parking spaces on your entitlement application plans.
8. **Car Sharing.** Please designate the one required car share space on your entitlement application plans.

9. **Building Height.** Pursuant to Planning Code Section 260(a)(1)(B), the measurement of height at Pennsylvania Avenue can only extend a depth of 100 ft. (i.e. downsloping), and the remaining 91 ft. (i.e. upsloping) must be measured at Iowa Street. Please revise your entitlement application plans to comply with this provision.

10. **Height Exemptions.** Please include 1/4” or 1/8” scale elevations in your entitlement application plans to verify the height of the proposed rooftop structures comply with Planning Code Section 260(b).

11. **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

12. **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/sgd](http://sfwater.org/sgd). Applicants may contact stormwaterreview@sfwater.org for assistance.

13. **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.

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% 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.

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 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](http://sfenvironment.org/zero-waste/overview/legislation). Please also
see the Guidance on Recycling Design (page 3) resources for designing appropriate areas:
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:

**Streetscape and Public Realm**

The Street Design Advisory Team (SDAT) provides design review and guidance to private developments
working within the City’s public right-of-way. SDAT is composed of representatives from the San
Francisco Planning Department (SF Planning) Department of Public Works (SF Public Works), the San
Francisco Municipal Transportation Agency (SFMTA), and the San Francisco Public Utilities Commission
(SFPUC). SDAT reviewed the proposal on March 12, 2018 and below are the comments from that
meeting.

1. **Required Bulb-outs.** The Project Sponsor shall add one wrap-around bulb-out on the corner of
Pennsylvania Avenue and 25th Street. The bulbout should extend six feet into both the Pennsylvania
and 25th right-of-ways.
2. **Required ADA Ramps.** The Project shall include a receiving pedestrian curb ramp at both Pennsylvania Avenue and 25th Street.

3. **Required Street Trees.** Please include required street trees on future plan submittals. Please note that significant trees onsite will require tree protection or a permit for removal. Per SFMTA standards, street trees are prohibited within 25 feet of the near-side approach to the Pennsylvania Ave and 25th Street intersection. Please coordinate with Brandon Namm from the Public Works Bureau of Urban Forestry at brandon.namm@sfdpw.org regarding this item.

4. **Required Lighting.** The Project is expected to provide street lighting plans, which illuminate the roadway and sidewalks fronting the property, for both Pennsylvania Ave. and 25th Street.

5. **Active Building Façade.** SDAT is concerned about the lack of an active building façade along the 25th St frontage and encourages the inclusion of active uses and design at the ground floor.

6. **Operations and Electrical Transformer.** Loading deliveries for the proposed development shall be accommodated within the Project’s garage. Per Code Section 152, three off street loading spaces are required, pursuant to dimensional requirements in Code Section 154. The electrical transformer should be sited within the project site. SDAT does not support siting an electrical transformer within the public ROW at this location. Finally, please identify the location of the trash room and the access route for trash removal.

The Department’s Urban Design Advisory Team (UDAT) also reviewed the project and is generally supportive of the proposed architecture and design, but will further review the entitlement application plans.

**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.

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. **Jobs-Housing Linkage Fee (§413)**
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. An **Environmental Evaluation Application** is required for the environmental review.

2. An **Office Allocation Application** is required for 25,000 sq. ft. or more of office development pursuant to Planning Code Section 320.

3. A **Conditional Use Authorization Application** may be required depending on the proposed use(s) under provisions of the M-1 and M-2 zoning districts pursuant to Planning Code Sections 210.4 and 303.

4. A **Building Permit Application** is required for construction of the building on the subject site. 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](http://sf-planning.org/permit-forms-applications-and-fees).

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 [http://sf-planning.org/permit-forms-applications-and-fees](http://sf-planning.org/permit-forms-applications-and-fees). 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. **Neighborhood Outreach.** This project is required to undertake additional public outreach in advance of the Planning Commission hearing on the Office Allocation and/or Conditional Use Authorization. The developer is required to conduct an additional outreach meeting, notifying owners and tenants who live within 300’ of the project as well as all registered neighborhood organizations for the Potrero Hill neighborhood, after initial design comments have been provided from the Planning Department and prior to the scheduling of the aforementioned Planning Commission hearing. The purpose of this meeting is to keep the community abreast of the project’s evolution, presenting the latest design of the project – including the Department’s requested changes – to the community in advance of the Commission taking action on the hearing.

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, Office Allocation, or Building Permit Application, as listed above, must be submitted no later than November 25, 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: SDAT Comment Letter

Shadow Fan

cc: Sherman Little, 1111 Pennsylvania Avenue Associates, LLC
    Diane Livia, Environmental Planning
    Jeremy Shaw, Citywide Planning and Analysis
    David Winslow, City Design
    Jonas Ionin, Planning Commission Secretary
    Charles Rivasplata, SFMTA
    Jerry Sanguinetti, Public Works
    Pauline Perkins, SFPUC
    June Weintraub and Jonathan Piakis, DPH
    Planning Department Webmaster (planning.webmaster@sfgov.org)
DATE: 04/13/2018

TO: Doug Vu (Current Planning); Diane Livia (Environmental Planning)

CC: SF Public Works: Paul Barradas; Simon Bertrang; Chris Buck; Brent Cohen; Kevin Jensen; Suzanne Levine; Kathy Liu; Kelli Rudnick; Rahul Shah; Berhane Gaime

SFMTA: Jennifer Molina; Paul Kniha; Sam Lam; Ricardo Olea; Charles Rivasplata; Mike Sallaberry; James Shahamiri; Adam Smith; Felipe Robles;

SF Planning: Paul Chasan; Esmeralda Jardines; Seung Yen Hong; Neil Hrushowy; Jessica Look; Manoj Madhavan; Maia Small; Lana Wong; David Winslow; Dan Wu

SFPUC: Josh Bardet; Mira Chokshi; Josselyn Ivanov; Joan Ryan; Sam Young; Hieu Doan; April Yan

FROM: The Street Design Advisory Team (SDAT)

RE: SDAT Review
Case NO. 2018-002951PPA
Address: 1111 Pennsylvania Ave.
Neighborhood: Potrero Hill
Zoning: PDR-2 (PDR Production, Distribution, and Repair)
Area Plan: None

The Street Design Advisory Team (SDAT) provides design review and guidance to private developments working within the City’s public right-of-way. SDAT is composed of representatives from the San Francisco Planning Department (SF Planning), Department of Public Works (SF Public Works), the San Francisco Municipal Transportation Agency (SFMTA), and the San Francisco Public Utilities Commission (SFPUC).

SDAT reviewed the proposal at 1111 Pennsylvania Ave. on March 12, 2018. Below are the SDAT comments from that meeting.

CONTEXT

Project Description & Transportation-Related Notes
The project includes the demolition of an existing Mini Storage facility, removal of existing shipping containers and new construction of a 5 stories (65’-0” tall) building over basement. The building will function as PDR use, with accessory Office. In addition to PDR, the project will have
2,500 sq. ft. of new retail at the corner of Pennsylvania and 25th Street. Basement parking is accessible from 25th Street.

**SDAT Triggers**

BSP Required (Planning Code 138.1): ☑ Yes ☐ No
Other (Please Describe): ☐ Yes ☑ No

**Site Conditions**

(See Transportation Info Map http://sftransportationmap.org/)

- Vision Zero Network High Injury Corridor: ☑ Yes ☒ No
- Bicycle High Injury Corridor: ☐ Yes ☑ No
- Pedestrian High Injury Corridor: ☐ Yes ☑ No
- Bicycle Network: ☑ Yes ☒ No
- Green Connections Network: ☑ Yes ☒ No
- Muni Corridor: ☑ Yes ☒ No
- Transit Preferential Street: ☐ Yes ☑ No
- Key Walking Street: ☐ Yes ☑ No
- Curb Cut Restriction: ☑ Yes ☒ No
- Missing Curb Ramps: ☐ Yes ☑ No
- SFMTA or Public Works Projects: ☑ Yes ☐ No

**SDAT COMMENTS**

**Related City Projects**

**Area Plans/ Public Realm Plans**

The project site is located within the Central Waterfront/Dogpatch Public Realm Plan. The City currently is in the early stages of a community planning process for a Public Realm Plan for the Dogpatch neighborhood (see: [http://sf-planning.org/central-waterfront-dogpatch-public-realm-plan](http://sf-planning.org/central-waterfront-dogpatch-public-realm-plan)). The proposed development falls within the planning area for this Public Realm Plan. The Plan will result in conceptual streetscape redesign projects that could include sidewalk widening, corner bulb-outs, landscaping, street trees, bike improvements, or other street improvements. The project sponsor is invited to participate in this process. Other key information on your site from this planning process include:

- 25th Street is a key east-west through connection between Potrero Hill and Dogpatch. Importance will increase with the development of HOPE SF Potrero and Potrero Power Plant site. Other major institutions Minnesota Street Project) and highly visited PDR businesses (Harmonic Brewery) have located along or near the 25th Street Corridor, with more such destinations anticipated. Dogpatch’s southern mixed use (residential/commercial) core – Minnesota Street between 23rd and 25th – is adjacent to 25th Street, further emphasizing the need to think long-term about the pedestrian amenities along 25th Street.
STREET IMPROVEMENTS

Bulb-outs (Required)
- Project sponsor shall add one wrap-around bulb-out on the corner of Pennsylvania Avenue and 25th Street. The bulb-out should extend six feet into both the Pennsylvania and 25th right-of-ways.

Notes
- See Item #5 under the “Interagency Coordination and Additional Guidance” section below

ADA Ramps (Required)
- Install receiving pedestrian curb ramp at both Pennsylvania Avenue and 25th Street.

Notes
- Be advised that Public Works code requires sponsors installing ADA-compliant curb ramps at crosswalks to install receiving ramps at the opposite end of the crosswalk if none exist or if an existing ramp does not comply with modern City standards. Therefore, in addition to the ramps required on north-east corner in front of the project, the project sponsor will be required to install new ramps on the east side of Pennsylvania and north side of 25th Street

Street Trees (Required)
- Please include required street trees on future plan submittals.
- Please note, significant trees onsite will require tree protection or a permit for removal. Please coordinate with Brandon Namm from the Public Works Bureau of Urban Forestry on this item (brandon.namm@sfdpw.org)

Landscaping (Recommended)
- Per SFMTA standards, street trees are prohibited within 25 feet of the near-side approach to the Pennsylvania Ave and 25th Street intersection

Notes
- Please refer to Item #8 under the “Interagency Coordination and Additional Guidance” section below.

Lighting (Required)
- Project sponsor is expected to provide street lighting plans, which illuminate the roadway and sidewalks fronting the property, for both Pennsylvania Ave. and 25th Street.

Notes
Please refer to Item #11 under “Interagency Coordination and Additional Guidance” section below.
**Lack of Active Building Facade**
SDAT is concerned about the lack of active building façade along the 25th St frontage. Please coordinate with the Urban Design Advisory Team (UDAT) on this comment.

**OPERATIONS**

- Loading Deliveries for the projects site shall be accommodated within the project’s garage. Per Code Section 152, one off street loading space is required, pursuant to dimensional requirements in Code Section 154.

*Notes*
- Please refer to Item #2 under “Interagency Coordination and Additional Guidance” section below.

**Transformer/ Trash**

- The electrical transformer should be sited within the project site. SDAT does not support siting an electrical transformer within the public ROW at this location.
- Please clarify location of the trash room and the access route for trash removal.

*Notes*
Please refer to Item #3 under “Interagency Coordination and Additional Guidance” section below.

**Additional Information Required for Next SDAT Review**

- Existing/proposed curb cuts and curb cuts to be removed
- Street names
- Dimensions of existing and proposed sidewalk and curb extensions on plans
- Dimensions of existing and proposed curb cuts on plans
- Dimensions of existing and proposed transit stops
- Site plan with streetscape features (e.g. bulbouts, trees, transit shelters, benches, bike racks)
- Proposed street tree locations
- Adjacent ROW widths
- Locations of existing utility poles and hydrants
- Turn templates for ______ (e.g. freight loading or bulbout)
- Curb-to-curb section, including dimensions of tree wells and path of travel
- Proposed transformer vault location

**INTERAGENCY COORDINATION AND ADDITIONAL GUIDANCE**

**SFMTA**

1. **On-Street Bike Rack Coordination**

- Planning Code Sections 155.1, 155.4, and 155.5, dictate the number of required Class 1 (in-building) and Class 2 (on-street or sidewalk) bike racks required by the project. SFMTA has final authority on the type, placement and number of Class 2 bicycle racks within the public ROW, and the SFMTA Bike Program coordinates the installation of on-street
bicycle racks and ensures that proposed bicycle racks meet the SFMTA’s bicycle parking guidelines.

- If Class 2 racks are required, the project sponsor should contact the SFMTA Bike Program (bikeparking@sfmta.com) prior to issuance of first architectural addenda and submit a site plan showing proposed Class 2 bike rack design and locations. Depending on local site conditions and anticipated demand, SFMTA may request the project sponsor pay an in-lieu fee for Class 2 bike racks required by the Planning Code. Before contacting the SFMTA, please review the Bike Rack Specifications and Sidewalk Bicycle Rack Placement Guidelines, which can be found on the SFMTA’s website at: https://www.sfmta.com/services/streets-sidewalks/installation-requests/bicycle-racks-corrals

2. Loading
   - The establishment of colored curbs for passenger and commercial loading on street requires coordination with SFMTA. Please contact Paul Kniha at paul.kniha@sfmta.com

Public Works
3. Electrical Transformer Room
   - If a new electrical power transformer is required by the electric utility to provide power to the building, please show the location of the transformer room on the plans. The transformer room must be shown on the plans for review by SDAT and Public Works during the planning phase of the project prior to applying for a Building Permit and Public Works Permits. Public Works typically does not permit new transformer vaults in the public right-of-way.

4. Street Improvements (construction within the public right-of-way)
   - Infrastructure improvements within the public right-of-way will require a Street Improvement Permit from SF Public Works Bureau of Street Use & Mapping (BSM) and Street Improvement Plans. Depending on the scope of work the Plans should include the following plan sheets: Civil (grading, layout, utility erosion control, etc.), Landscaping (planting, irrigation, etc.), Electrical (lighting, photometrics, conduit, etc.), Joint Trench (power, telephone, and communication approved by the respective utility companies). Additional permits may be required. Visit http://www.sfpublicworks.org/services/permits for additional information or call 415-554-5810.

5. Modified Curb Lines (widened or narrowed sidewalk and corner bulbouts)
   - Per guidelines established in the San Francisco Better Streets Plan the tangent of the curb return on a corner bulbout should start a minimum of 5’ beyond the property line.
To ensure that bulbouts are sweepable with standard City street sweeper equipment, bulbout curb returns shall conform to SF Public Works’ Standard Plan for Curb Bulbs. See: http://sfpublicworks.org/sites/default/files/87%2C175.pdf

Modification of the curb line will require Sidewalk Legislation, contact BSM Mapping/Subdivision Section. It is strongly encouraged that a sidewalk legislation package is submitted at the time a Street Improvement Permit application is submitted since the permit will not be approved until the Sidewalk Legislation is approved, which can take a minimum of 6-12 months for approval.

6. Encroachments into the Public Right-of-Way

SF Public Works discourages any new encroachments into the public right-of-way. If new encroachments are proposed, show them on the plans. Examples of encroachments are: steps, warped driveways with diverters/planters, level landings, fire department connections (FDC), out swinging doors, bollards, etc. For new building construction, the Building Code does not allow building encroachments unless a variance to the Building Code is allowed by the DBI. If a variance is approved, a Minor Sidewalk Encroachment Permit (MSE) or other encroachment permit will be required from BSM. Most encroachment permits require public notification and, depending on the encroachment an annual assessment fee may be applied.

7. Special (non-standard) projects in the public right-of-way (plazas, parks, shared streets, etc.)

Any modification of the public right-of-way that deviates from SF Public Works Standard Plans and Specifications may require a Major Encroachment Permit (MEP) from the BSM. It is strongly encouraged that the plans for the MEP are complete and all application submittals are promptly submitted to BSM at the time of the Street Improvement Permit application is submitted because the MEP can take a minimum of 6-12 months. For information on the Major Encroachment permitting process visit http://www.sfpublicworks.org/services/permits or call 415-554-5810.

8. Street trees

All landscaping, street trees, site furniture, and special paving should be consistent with guidelines in the Better Streets Plan (BSP). See www.sfbetterstreets.org.

Per SFMTA standards, trees are not allowed within 25 feet of the corner property line on approach, but trees can be placed closer to the intersection on exit, to enhance pedestrian visibility and safety.

Per SFPUC standards, new trees shall not be placed within 5 feet of water facilities, including water mains and water service laterals.

Any proposed new, removed, or relocated street trees and/or landscaping within the public sidewalk may require a permit from SF Public Works Bureau of Urban Forestry (BUF). Tree species should be selected from the “Recommended Plants List”. For more
Information, please visit: [http://sfpublicworks.org/trees](http://sfpublicworks.org/trees) or call (415) 554-6700. To apply for a permit: [http://sfpublicworks.org/services/permits/street-trees-planting](http://sfpublicworks.org/services/permits/street-trees-planting).

### SFPUC

**9. Clean Energy**

- This project is eligible to use Hetch Hetchy Power: the SFPUC provides 100% greenhouse gas-free electric service at energy rates about 10% lower than other power providers. There may be opportunities to share necessary electrical equipment between buildings, further reducing costs. San Francisco Administrative Code Section 99 requires the SFPUC to consider providing power for certain types of private development projects, including infill and large new buildings. The SFPUC has been providing clean power to some of San Francisco’s most critical facilities for 100 years. For more information, please contact HHPower@sfwater.org.

**10. Water**

- A hydraulic analysis will be required to confirm the adequacy of the water distribution system for proposed new potable, non-potable and fire water services. If the current distribution system pressures and flows are inadequate, the Project Sponsor will be responsible for any capital improvements required to meet the proposed project’s water demands. To initiate this process, please contact the SFPUC Customer Service Bureau at 415-551-2900.

- The project sponsor will be required to design all applicable water facilities, including potable, fire-suppression, and non-potable water systems, to conform to the current SFPUC City Distribution Division (CDD) and San Francisco Fire Department (SFFD) standards and practices. These include, but are not limited to, the following:
  a. SFPUC- CDD Protection of Existing Water and AWSS Facilities;
  b. SFPUC Standards for the Protection of Water and Wastewater Assets;
  c. Rules and Regulations Governing Water Service to Customers;
  d. SFPUC- CDD Design Criteria for Potable Water Systems;
  e. Application for Water Supply and Responsibility of Applicants;
  f. San Francisco Fire Code and Reliability;
  g. California Waterworks Standards; California Code of Regulations Titles 17 and 22

For questions please contact cddengineering@sfwater.org.

**11. Street Lighting**

- City Charter Section 8B.121 and City Administrative Code Section 25.6, states that the PUC has exclusive charge of the construction, management, supervision, maintenance, extension, expansion, operation, use and control of all water, clean water and energy supplies and utilities of the City. This includes the authority to determine the intensity of
illumination, number and spacing of lighting facilities and other details necessary to secure satisfactory street lighting.

- City Administrative Code, Section 25.1, states that the Director of Public works shall require underground street lighting facilities, including standards, all associated wires, cables, conduits, junction boxes, services, and all connections therewith satisfactory to the PUC, be included in all plans, maps, plats, and specifications, for the opening of new streets, tracts, districts or subdivisions, except when arrangements have been made by the PUC for installation of adequate overhead street lighting facilities on utility poles.

- City Administrative Code, Section 941, requires the cost of underground wired facilities for street lighting to be borne by the person, firm or corporation paying for the grading, paving, sidewalks and other street construction.

- Illumination levels for roadways, sidewalks and intersections must comply per Illuminating Engineering Society (IES) RP-8. The project sponsor will be expected to propose a street lighting plan and provide photometric studies for the proposed lighting design. Reference SFPUC’s streetlight catalogue for approved streetlight fixtures and poles. Fixtures and poles selected outside of the SFPUC catalogue will be maintained by the property owner(s).

- Mixing City and PG&E streetlight jurisdiction for a project is typically not permitted. For example, if the project sponsor proposes to install City-standard streetlights on one side of the property, the project sponsor will be responsible for utilizing City-standard streetlights to illuminate the entire property.

- Both surface and subsurface streetlight facilities are required to remain in compliance with Public Works’ standard plans after grade adjustments.

- Separation requirements between streetlights and street furniture must comply per City streetscape ordinances, such as Public Works’ ordinances regarding streetlights and trees.

- For questions regarding street lighting or modifications to streetlight infrastructure (both City and PG&E-owned), please contact Streetlights@sfwater.org.
The City and County of San Francisco (CCSF) does not guarantee the accuracy, adequacy, completeness or usefulness of any information. CCSF provides this information on an "as is" basis without warranty of any kind, including but not limited to warranties of merchantability or fitness for a particular purpose, and assumes no responsibility for anyone's use of the information.

Title: 1111 Pennsylvania Street - 2018-002951PPA
Comments: Proposed PDR building with accessory office and small retail store.
Printed: 26 April, 2018