



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** April 7, 2014  
**TO:** Jeff Burris  
**FROM:** Susan Exline, Planning Department  
**RE:** PPA Case No. 2014.0231U for 331 Pennsylvania Avenue

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

Reception:  
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Please find attached the Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Paolo Ikezoe, at (415) 575-9137 or [Paolo.Ikezoe@sfgov.org](mailto:Paolo.Ikezoe@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 "Susan Exline", written over a horizontal line.

Susan Exline, Senior Planner



# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* April 7, 2014  
*Case No.:* **2014.0231U**  
*Project Address:* 331 Pennsylvania Avenue  
*Block/Lot:* 4040/026  
*Zoning:* RH-2 (Residential, House, Two-Family) Zoning District  
40-X Height and Bulk District  
*Area Plan:* Showplace Square/Potrero Hill Area Plan  
*Project Sponsor:* Jeff Burris, Studio 12 Architecture  
415-503-0212  
*Staff Contact:* Paolo Ikezoe – 415-575-9137  
[paolo.ikezoe@sfgov.org](mailto:paolo.ikezoe@sfgov.org)

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### DISCLAIMERS:

Please be advised that this determination does not constitute an application for development with the Planning Department. It also does not represent a complete review of the proposed project, a project approval of any kind, or 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, Department of Public Works, Department of Public Health, and others. The information included herein is based on plans and information provided for this assessment and the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

### PROJECT DESCRIPTION:

The proposal includes a change of use of an existing convalescent home (residential care facility) into six dwelling units. The subject property contains approximately 10,767 square feet and is located on a 9,999 sq ft lot measuring approximately 100-ft by 100-ft. The project would construct a two-story rear horizontal addition (measuring approximately 36-ft by 13-ft 5-in and containing 2,070 sq ft), as well as three private balconies on the north facade. The project also includes five new off-street parking spaces, and construction of a new roof deck with a rooftop garden and solar panels. Exterior alterations on the primary facade are limited to insertion of a new garage door and limited window replacement/repair.

### ENVIRONMENTAL REVIEW:

In compliance with the California Environmental Quality Act (CEQA), the environmental review process must be completed before any project approval may be granted. This review may be done in conjunction with the required approvals listed below. In order to begin formal environmental review, please submit an Environmental Evaluation Application for the full scope of the project (demolition and construction).

Environmental Evaluation 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) under the "Publications" tab. See "Environmental Applications" on page 2 of the current Fee Schedule for calculation of environmental application fees.<sup>1</sup>

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. The proposed project is located within the *Eastern Neighborhoods Rezoning and Area Plans*,<sup>2</sup> which was evaluated in *Eastern Neighborhoods Rezoning and Area Plans Programmatic Final Environmental Impact Report* ("*Eastern Neighborhoods FEIR*"), which was certified in 2008.<sup>3</sup>

Because the proposed project is consistent with the development density identified in the area plan, the project is likely to qualify for a Community Plan Exemption (CPE) under the *Eastern Neighborhoods Rezoning and Area Plans*.

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

- (i) **CPE Only.** All potentially significant project-specific and cumulatively considerable environmental impacts are fully consistent with significant impacts identified in the *Eastern Neighborhoods FEIR*, and there would be no new "peculiar" significant impacts unique to the proposed project. In these situations, all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods FEIR* 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 \$13,339); (b) the CPE certificate fee (currently \$7,402); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the *Eastern Neighborhoods FEIR*.
- (ii) **CPE + 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 FEIR*, 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. In addition, a supporting CPE certificate is prepared to address all other impacts that were encompassed by the *Eastern Neighborhoods FEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods FEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation

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<sup>1</sup> San Francisco Planning Department. *Schedule for Application Fees*. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=513>

<sup>2</sup> San Francisco Planning Department. *Eastern Neighborhoods Rezoning and Area Plans*. Available online at: <http://www.sf-planning.org/index.aspx?page=1893>. Accessed February 21, 2014.

<sup>3</sup> Available for review on the Planning Department's Area Plan EIRs web page: <http://www.sf-planning.org/index.aspx?page=1893>.

fee (which is based on construction value); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the *Eastern Neighborhoods FEIR*.

- (iii) **CPE + 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 certificate is prepared to address all other impacts that were encompassed by the *Eastern Neighborhoods FEIR*, with all pertinent mitigation measures and CEQA findings from the *Eastern Neighborhoods FEIR* also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); (c) one-half of the standard EIR fee (which is also based on construction value); and (d) a proportionate share fee for recovery for costs incurred by the Planning Department for preparation of the *Eastern Neighborhoods FEIR*.

Based on the preliminary review of the proposed project, the project could be eligible for a Class 1 categorical exemption from environmental review under CEQA Guidelines Section 15301. Class 1 allows for an exemption for minor alteration of existing facilities from the provisions of CEQA. If the proposed project meets the criteria outlined in CEQA Guidelines Section 15301(e) and if the project would not result in a significant impact on the environment, the project could be eligible for a Class 1 exemption. If a Class 1 exemption is appropriate, Environmental Planning staff will prepare a certificate of exemption.

The following environmental issues would likely be addressed as part of the project's environmental review based on our preliminary review of the proposed project as it is described in the Preliminary Project Assessment (PPA) submittal dated February 11, 2014:

1. **Historic Architectural Resources.** Based upon the Showplace Square/Northeast Mission Historic Resource Survey, 331 Pennsylvania Avenue (former Union Iron Works/Bethlehem Steel Co. Hospital) was assigned a California Historic Resource Status Code (CHRSC) of "3S," which defines the subject property as "appears eligible for NR as an individual property through survey evaluation." Therefore, 331 Pennsylvania Avenue is considered to be a historic resource for the purposes of CEQA.

Due to the limited scope of work, the Department shall not request additional review from a historic resource consultant. Analysis of the proposed project's impacts upon the historic resource will be conducted administratively with Department Preservation staff. Please ensure that all appropriate material is included within the architectural drawings, including existing and proposed window information, proposed exterior materials, and details.

2. **Archeological Resources.** Project implementation would entail soil-disturbing activities associated with building construction, including excavation that would reach a depth of up to approximately six feet below grade.<sup>4</sup> The project site is located within an area for which a final archeological research design and treatment plan (ARDTP) is on file at the Northwest Information Center and the Planning

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<sup>4</sup> Jeff Burris, Project Sponsor. *Email to Kei Zushi, San Francisco Planning Department, Additional Information: PPA – 331 Pennsylvania Avenue (Case No. 2014.0231U)*, March 11, 2014. This email is available for review as part of Case File No. 2014.0231U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

Department. The *Eastern Neighborhoods FEIR* noted that California Register of Historical Resources (CRHR)-eligible archeological resources are expected to be present within existing sub-grade soils of the Plan Area and the proposed land use policies and controls within the Plan Area could adversely affect significant archeological resources.

The Planning Department staff has preliminarily determined that *Eastern Neighborhoods FEIR Archeological Mitigation Measure J-1: Properties With Previous Studies* would be applicable to the proposed project. This mitigation measure requires that the project sponsor of any project resulting in soils-disturbance of 2.5 feet or greater below existing grade submit to the Environmental Review Officer (ERO) for review and approval an addendum to the respective ARDTP. The addendum shall be prepared by a qualified archeological consultant with expertise in California prehistoric and urban historical archeology. The addendum to the ARDTP shall evaluate the potential effects of the project on CEQA-significant archeological resources with respect to the site- and project-specific information absent in the ARDTP. The addendum to ARDTP should have the contents as outlined in *Eastern Neighborhoods FEIR Archeological Mitigation Measure J-1*.

The qualified consultant must be selected from a list of three archeological consultants from the Planning Department's archeological resources consultant file provided by the Planning Department during the environmental review process.<sup>5</sup> The Planning Department Archeologist will be informed by the geotechnical study of the project site's subsurface geological conditions (see Item 7, Geology, below).

3. **Transportation and Circulation.** The proposed project involves the conversion of an existing, vacant 10,000-sf building, which was used as a convalescent home until January or February 2014, to a six-unit residential building. Based on this, a Transportation Impact Study (TIS) would likely not be required for the proposed project.

A formal determination as to whether a TIS is required will be made after submittal of the Environmental Evaluation Application. If a TIS is required, the Planning Department will provide additional guidance related to the process for selecting a transportation consultant and assist in the development of the scope of work for the analysis. The consultant must be selected from a list of three transportation consultants from the Planning Department's transportation consultant file provided by the Planning Department during the environmental review process.<sup>6</sup>

At the time of filing of the Environmental Evaluation Application, please ensure that the project description responds to the following comments:

- a. Show the width of both the existing and proposed curb cuts in the site plan (Plan Sheet A1.1). The recommended width of the proposed driveway is 12 feet.

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<sup>5</sup> San Francisco Planning Department. *Consultant Resources, Archeological Review Consultant Pool*. Available online at: <http://www.sf-planning.org/index.aspx?page=1886>.

<sup>6</sup> San Francisco Planning Department. *Consultant Resources, Transportation Consultant Pool*. Available online at: <http://www.sf-planning.org/index.aspx?page=1886>

- b. Clarify in the site plan (Plan Sheet A1.1) whether the existing curb cut would be removed as part of this project.
  - c. Consider adding more bicycle parking spaces because there would be larger/family-sized units.
  - d. Coordinate with SFMTA regarding relocation of on-street parking spaces.
4. **Noise.** *Eastern Neighborhoods FEIR Noise Mitigation Measure F-1: Construction Noise*, addressing requirements related to the use of pile-driving, would not apply to the proposed project because pile-driving would not be utilized as part of the project.<sup>7</sup>

*Eastern Neighborhoods FEIR Noise Mitigation Measure F-2: Construction Noise* may apply to the proposed project. This mitigation measure requires that the Planning Director require 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.

Based on the *Eastern Neighborhoods FEIR*, the project site is located in an area where traffic-related noise exceeds 60 dBA  $L_{dn}$  (a day-night averaged sound level). *Eastern Neighborhoods FEIR Noise Mitigation Measure F-3: Interior Noise Levels* requires that the project sponsor conduct a detail analysis of noise reduction requirements for new development including noise-sensitive uses located along streets with noise levels above 60 dBA ( $L_{dn}$ ), where such development is not already subject to the California Noise Insulation Standards in Title 24 of the California Code of Regulations. *Noise Mitigation Measure F-3* would apply to the proposed project if the project is not subject to the California Noise Insulation Standards.

*Eastern Neighborhoods FEIR Noise Mitigation Measure F-4: Siting of Noise-Sensitive Uses* is intended to reduce potential conflicts between existing noise-generating uses and new sensitive receptors. This measure would apply to the proposed project because the project includes a noise-sensitive use. *Noise Mitigation Measure F-4* requires that a noise analysis be prepared for new development including a noise-sensitive use, prior to the first project approval action. The mitigation measure requires that such an analysis include, at a minimum, a site survey to identify potential noise-generation uses within 900 feet of, and that have a direct line-of-sight to, the project site. At least one 24-hour noise measurement (with maximum noise level readings taken at least every 15 minutes) shall be included in the analysis. The analysis shall be prepared by person(s) qualified in acoustical analysis and/or engineering and shall demonstrate with reasonable certainty that Title 24 standards, where applicable, can be met, and that there are no particular circumstances about the project site that appear to warrant heightened concern about noise levels in the vicinity. This study must be

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<sup>7</sup> Jeff Burris, Project Sponsor. *Email to Kei Zushi, San Francisco Planning Department, Noise: 331 Pennsylvania Avenue (Case No. 2014.0231U)*, March 13, 2014. This email is available for review as part of Case File No. 2013.0231U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

completed for inclusion in the environmental document. Should such concerns be present, the Planning Department may require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering prior to the first project approval action.

*Eastern Neighborhoods FEIR Noise Mitigation Measure F-5: Siting of Noise-Generating Uses* would not apply to the proposed project because the project would not include commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise, either short term, at nighttime, or as a 24-hour average, in the project site vicinity.

Finally, *Eastern Neighborhoods FEIR Noise Mitigation Measure F-6: Open Space in Noisy Environments* would apply to the proposed project as it includes new development of a noise-sensitive use. This mitigation measure requires that open space required under the Planning Code be protected from existing ambient noise levels. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles or urban design.

## 5. Air Quality.

### *Criteria Air Pollutants*

The proposed project would not exceed the Bay Area Air Quality Management District's (BAAQMD) construction or operational screening level for criteria air pollutants.<sup>8</sup> Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required for the proposed project.

### *Local Health Risks and Hazards*

San Francisco has partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified. Land use projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations. Although the proposed project is not within an Air Pollutant Exposure Zone, improvement measures may be recommended for consideration by City decision makers such as exhaust measures during construction.

If the project would generate new sources of toxic air contaminants including, but not limited to: 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. If the proposed project generates new sources of toxic air contaminants, additional measures will likely be necessary to reduce its emissions. Detailed information related to any proposed stationary sources shall be provided with the Environmental Evaluation Application.

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<sup>8</sup> BAAQMD, *CEQA Air Quality Guidelines*, May 2011, Chapter 3.

6. **Greenhouse Gases.** Potential environmental effects related to greenhouse gas (GHG) emissions from the proposed project need to be addressed in a project's environmental evaluation. The project sponsor would be required to submit a completed GHG Compliance Checklist Table 1 for Private Development Projects<sup>9</sup> demonstrating that the project is in 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.<sup>10</sup> Projects that do not comply with a GHG-related regulation may be determined to be inconsistent with San Francisco's Greenhouse Gas Reduction Strategy.
7. **Wind.** The proposed project would involve the installation of a new elevation cab on the top of the roof of the existing building, but would not increase the height of the existing building as defined by the Planning Code, which is 35.5 feet. Therefore, no further wind analyses would be required for the proposed project.
8. **Shadow.** The proposed project would involve the installation of a new elevation cab on the top of the roof of the existing building, but would not increase the height of the existing building as defined by the Planning Code, which is 35.5 feet. Therefore, no further shadow analyses would be required for the proposed project.
9. **Geotechnical Investigation.** According to the Planning Department records, the project site includes slopes greater than 20 percent. In addition, any new construction on the project site is subject to a mandatory Interdepartmental Project Review because it is located within a Seismic Hazard Zone, or Landslide Hazard Zone.<sup>11</sup> In general, compliance with the building codes would reduce the potential for impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement to a less-than-significant level. To assist our staff in reviewing the proposed project, the project sponsor should provide a copy of a geotechnical investigation with boring logs for the project. This study will also help us conduct the archeological review.
10. **Hazardous Materials.** The project site is located within the Maher Zone based on the Planning Department's records. The project sponsor has indicated that the proposed project would entail soil-disturbing activities associated with building construction, including excavation that would reach a depth of up to approximately six feet below grade and a total amount of up to approximately 125 cubic yards.<sup>12</sup> A Phase I Environmental Site Assessment (ESA) prepared for the project site<sup>13</sup> indicates

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<sup>9</sup> San Francisco Planning Department. *Consultant Resources. Greenhouse Gas Compliance Checklist for Private Development Projects.* Available online at: <http://www.sf-planning.org/index.aspx?page=1886>

<sup>10</sup> City and County of San Francisco. *Strategies to Address Greenhouse Gas Emissions.* Available online at: [http://sfmea.sfplanning.org/GHG\\_Reduction\\_Strategy.pdf](http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf)

<sup>11</sup> San Francisco Planning Department. *Interdepartmental Project Review.* Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=522>.

<sup>12</sup> Jeff Burris, Project Sponsor. *Email to Kei Zushi, San Francisco Planning Department, Additional Information: PPA – 331 Pennsylvania Avenue (Case No. 2014.0231U),* March 11, 2014. This email is available for review as part of Case File No. 2014.0231U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.



that there is an underground storage tank (UST) for heating oil which was installed under the Pennsylvania Avenue sidewalk and that the presence of an underground storage tank is a Recognized Environmental Concern.

Based on the above, the project 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 ESA that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

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

Please provide a copy of the submitted Maher Application and Phase I ESA with the Environmental Evaluation Application (EEA).

*Eastern Neighborhoods FEIR Hazardous Materials Mitigation Measure L-1: Hazardous Building Materials* would be applicable to the proposed project. The mitigation measure requires that the project sponsor ensure that any equipment containing PCBs or DEPH, such as fluorescent light ballasts, and any fluorescent light tubes containing mercury be removed and properly disposed of in accordance with applicable federal, state, and local laws. In addition, any other hazardous materials identified, either before or during work, shall be abated according to applicable federal, state, and local laws. Because the existing building on the project site was constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the building. BAAQMD is responsible for regulating airborne pollutants including asbestos. Please contact BAAQMD for the requirements related to alteration of buildings that may contain asbestos-containing materials. In addition, because of their age, lead paint may be found in the existing building. Please contact DBI for requirements related to alteration of buildings that may contain lead paint.

- 11. Tree Disclosure Affidavit.** The Department of Public Works Code Section 8.02-8.11 requires disclosure and protection of landmark, significant, and street trees located on private and public property.<sup>14</sup> Any tree identified in the Affidavit for Tree Disclosure must be shown on the Site Plans with the size of trunk diameter, tree height, and accurate canopy drip line. Please submit an Affidavit along with the Environmental Evaluation Application and ensure that trees are appropriately shown on site plans.

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<sup>13</sup> John Carver Consulting. *Phase I Environmental Site Assessment at 331-333 Pennsylvania Avenue, San Francisco, California*, February 26, 2013. This email is available for review as part of Case File No. 2013.0231U at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

<sup>14</sup> San Francisco Planning Department. *Affidavit for Tree Disclosure*. Available online at: [http://sfmea.sfplanning.org/Tree\\_Disclosure.pdf](http://sfmea.sfplanning.org/Tree_Disclosure.pdf)

12. **Bird-Safe Building Ordinance.** The project would be subject to Planning Code Section 139, Standards for Bird-Safe Buildings, which addresses Location-Related Standards and Feature-Related Standards.<sup>15</sup> The project's environmental evaluation would generally discuss how the implementation of bird-safe design standards would reduce potential adverse effects on birds due to the lighting, glazing, balconies, and so forth.
13. **Notification of a Project Receiving Environmental Review.** Notice is required to be sent to occupants of properties adjacent to the project site and owners of properties within 300 feet of the project site. Please be prepared to provide these mailing labels upon request during the environmental review process.

#### 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. **Conditional Use Authorization** from the Planning Commission would be required per Planning Code Section 209.1 to allow for establishment of dwelling units at a ratio of one dwelling unit per 1,500 sq ft;
2. A **Building Permit Application** is required for the change in use and alterations to the existing building on the subject property.

All applications are available in the Planning Department lobby at 1650 Mission Street Suite 400, at the Planning Information Center at 1660 Mission Street, or online at [www.sfplanning.org](http://www.sfplanning.org). Building Permit applications are available at the Department of Building Inspections at 1660 Mission Street.

#### NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

Project Sponsors are encouraged 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.

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 Meeting 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.

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<sup>15</sup> San Francisco Planning Department. *Standards for Bird-Safe Buildings*. Available online at: <http://www.sfplanning.org/index.aspx?page=2506>

**PRELIMINARY PROJECT COMMENTS:**

The following comments address specific Planning Code and other general issues that may significantly impact the proposed project.

1. **Conditional Use Authorization:** Per Planning Code Section 209.1, Conditional Use Authorization from the Planning Commission is required to construct new dwelling units within the RH-2 Zoning District at a ratio of one dwelling unit per 1,500 sq ft of lot area. For the subject lot, six dwelling units are permitted with Conditional Use Authorization from the Planning Commission.
2. **Front Setback/Landscaping and Permeable Surfaces:** Planning Code Section 132 outlines the minimum front setback areas for properties located within the RH-2 Zoning District. In addition, Planning Code Section 132(g) and (h) outline requirements for landscaping and permeable surfaces for projects adding new dwelling units. Per Planning Code Section 132(g), the front setback is required to be approximately landscaped, meet any applicable water use requirements of Administrative Code Chapter 63, and in every case not less than 20 percent of the required setback area shall be and remain unpaved and devoted to plan material. Per Planning Code Section 132(h), the front setback area shall be at least 50% permeable so as to increase stormwater infiltration. Currently, the existing building appears to meet the front setback requirement.

Additional information will be required to determine the project's compliance with Planning Code Section 132(g) and (h). Please provide an existing and proposed site plan demonstrating the proposed landscaping and site work.

3. **Rear Yard:** Planning Code Section 134 outlines the rear yard requirements within the RH-2 Zoning District. The minimum rear yard depth shall be provided at grade and be equal to 45 percent of the total depth of the lot. Currently, the proposed project meets the rear yard requirement.
4. **Open Space:** Planning Code Sections 135 outline the requirements for usable open space for residential units. Generally, at least 125 square feet of private open space or 166.25 square feet of common open space (per dwelling unit) is required for each residential unit. For the six proposed dwelling units, the project is required to provide 997.5 sq ft of common open space. The project appears to meet this requirement, since it provides a new roof deck and has an ample rear yard.
5. **Permitted Obstructions:** Planning Code Section 136 outlines the requirements for permitted obstructions over streets, setbacks, rear yards, and useable open space. Currently, the project proposes three balconies on the north facade. Two of the proposed balconies (on the second floor and on the west end of the third floor) are located within the buildable area, and are not subject to the permitted obstruction requirements. The third balcony is located within the required rear yard and must meet the dimensional requirements specified in Planning Code Sections 136(c)(2) and (3).

Please provide dimensions for the third balcony to determine whether this element meets the requirements of the Planning Code.

6. **Street Trees/San Francisco Green Landscaping Ordinance:** The proposed project is subject to the San Francisco Green Landscaping Ordinance, which assists in articulating Planning Code Section 138.1.

Planning Code Section 138.1 outlines a provision for adding street trees when adding new dwelling units. A 24-inch box size street tree would be required for each 20 feet of frontage of the property along each street or alley, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. Based on the street frontage, it appears that five street trees would be required along Pennsylvania Street. Existing trees, if they were present on the project site, would apply towards the street tree requirement.

Please include an existing and proposed site plan to document the addition of new street trees. In addition, please review the site plan with the Department of Public Works (DPW) and obtain an "Interdepartmental Referral for Feasibility of Tree Planting or Removal" prior to submittal of the first entitlement.

7. **Exposure:** Planning Code Section 140 outlines requirements for all dwelling units to face an open area or street. All dwelling units shall feature a window that directly faces a street or open area that is a minimum of 25 ft in width. Currently, the proposed project meets the exposure requirement.
8. **Street Frontage in RH Districts:** Planning Code Section 144 outlines the requirements for entrances to off-street parking spaces within the RH-2 Zoning District. For new off-street parking areas, no more than one-third of the width of the ground story along the front lot line shall be dedicated to off-street parking. In addition, no entrance to off-street parking shall be wider than 20-ft. Per the Department's Guidelines for Adding Garages and Curbs Cuts, new garage doors and curb cuts should be limited to 10-ft wide.

Please provide information on the existing and proposed curb cuts, and the width of the proposed garage door. For historic buildings, the proposed garage door should be limited in width to minimize impacts upon historic features and materials.

9. **Parking:** Planning Code Section 151 outlines requirements for required off-street parking within the RH-2 Zoning District. All dwelling units are required to provide one off-street parking spaces; therefore, the project is required to provide six off-street parking spaces. Currently, the project proposed five off-street parking spaces.

To understand the existing and proposed parking requirements, please provide the number of beds/residents for the vacated residential care facility. This number shall inform the existing parking requirements, and determine whether or not the reduced number of parking spaces would be permitted.

10. **Bicycle Parking:** Planning Code Section 155.2 outlines requirements for Class 1 and Class 2 bicycle parking spaces for residential developments. The proposed project is required to provide six Class 1 bicycle parking space for every dwelling unit. Currently, the project provides six Class 1 bicycle parking spaces within the proposed garage; therefore, the project meets the bicycle parking requirement.

11. **Height-Exempted Features:** Planning Code Section 260(b) outlines features, which are exempted from the height limited established by the Planning Code. As noted in Planning Code Section 260(b)(1)(B), elevator, stair and mechanical penthouses, fire towers, skylights and dormer windows are considered exempted features. This exemption is limited to the top 10-ft of such feature where the height limit is 65-ft or less.

Please provide additional information, including dimensions, on the new elevator penthouse and enclosure. This elevator penthouse is limited to 10-ft in height, and must not include any habitable area.

12. **Neighborhood Notification.** Per Planning Code Section 311, neighborhood notification will be required, since the proposal involves new dwelling units and exterior expansion within the RH-2 Zoning District. This notification would be conducted in conjunction with the hearing notification for the Conditional Use Authorization.

13. **Eastern Neighborhoods Impact Fees:** Per Planning Code Section 423, the Eastern Neighborhoods Impact Fee applies to the project. Fees shall be assessed per net new gross square footage on new residential square footage (approx. 2,070 sq ft) within the Plan Area, and as a change of use from Non-Residential to Residential. Per Planning Code Section 890.50, the former residential care facility is classified as an institutional use; therefore, for the purposes of Eastern Neighborhoods Impact Fees, the residential care facility would be classified as a “Non-Residential Use.” For the most up-to-date schedule, please refer to the Department of Building Inspection (DBI) fee register:

<http://sfdbi.org/index.aspx?page=617>.

#### PRELIMINARY DESIGN COMMENTS:

The Department appreciates the overall scale, size and intent of the proposed project, which provides minimal intervention to a historic resource. The proposed alterations appear to be consistent with the Secretary of the Interior’s Standards for Rehabilitation. The Department will request additional information on new materials, windows, and features during the environmental review process.

#### PRELIMINARY GENERAL PLAN / POLICY COMMENTS:

**Eastern Neighborhoods - Showplace Square/Potrero Hill Area Plan:** The project is located within the boundary of the recently adopted Showplace Square/Potrero Hill (SS/PH) Area Plan of the Eastern Neighborhoods. Showplace Square and Potrero Hill are diverse neighborhoods with a rich mixture of housing, commercial and Production, Distribution & Repair (PDR) uses. The project, as submitted is generally consistent with the goals and vision of the plan, specifically with the goals below:

- Build on the existing character of Showplace Square – Potrero Hill and stabilize it as a place for living and working
- Strengthen and expand Showplace Square – Potrero Hill as a residential, mixed-use neighborhood

As currently drafted, the project is particularly in line with the following objectives of the **Showplace Square/Potrero Hill Area Plan** (SSPH):

- OBJECTIVE 8.2 PROTECT, PRESERVE, AND REUSE HISTORIC RESOURCES WITHIN THE SHOWPLACE SQUARE AREA PLAN
- OBJECTIVE 8.4 PROMOTE THE PRINCIPLES OF SUSTAINABILITY FOR THE BUILT ENVIRONMENT THROUGH THE INHERENTLY “GREEN” STRATEGY OF HISTORIC PRESERVATION

Information on the SS/PH Plan can be found on the Planning Department’s website at:

<http://easternneighborhoods.sfplanning.org>

#### PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Conditional Use Authorization, or Building Permit Application, as listed above, must be submitted no later than **October, 7, 2015**. 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: Neighborhood Group Mailing List

cc: Ed Maiello, Property Owner  
Rich Sucre, Current Planning  
Kei Zushi, Environmental Planning  
Paolo Ikezoe, Citywide Planning and Analysis  
Jerry Robbins, SFMTA  
Jerry Sanguinetti, SF DPW  
Andrea Bruss, Legislative Aide-Supervisor Malia Cohen

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Malia	Cohen	Supervisor, District 10	Board of Supervisors	1 Dr. Carlton B Goodlett Place, Room #244	San Francisco	CA	94102-4689	415-554-7670	Malia.Cohen@sfgov.org; Yoyo.Chan@sfgov.org; Andrea.Bruss@sfgov.org; cohenstaff@sfgov.org
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