



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: May 24, 2011
Case No.: **2011.0312U**
Project Address: 1321 Mission Street (aka 104 – 9th Street)
Block/Lot: 3509/043
Zoning: C-3-S (Downtown Support)
120-F Height and Bulk District
Project Sponsor: Patrick Kennedy, Panoramic Interests
2116 Allston Way
Berkeley, CA 94704
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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 project site is a 9,208sf lot containing a vacant 12,860sf, one-story-over-basement commercial structure built circa 1926, most recently occupied by The Guitar Center. The property is located on the southwest corner of Mission and 9th Streets in the South of Market neighborhood. The project proposes to demolish the existing structure and construct a new 120'-0" tall, 11 story mixed-use building with approximately 4,400sf of ground floor commercial space and 10 stories of residential dwelling-units. Each of the 10 floors of residential space would contain 20 studio dwelling-units, each of approximately 260gsf and referred to as "efficiency units", for a project total of 200 dwelling-units. The PPA Application indicates that the project would include on-site BMR dwelling units (15% or 30 units), two car-share parking spaces, no off-street parking spaces, and approximately 4,260sf of basement space dedicated to bicycle parking.

ENVIRONMENTAL REVIEW:

Pursuant to the California Environmental Quality Act (CEQA), this project would require an Initial Study to determine if a Negative Declaration (NegDec) or Environmental Impact Report (EIR) is required. An Environmental Evaluation Application is required for the full scope of the project (site grading, excavation and construction). To determine fees for environmental review, please refer to page one of our fee schedules, under "Studies for Project outside of Adopted Plan Areas." Results of the studies below would determine whether a NegDec or EIR is required. The application should be filed with the appropriate fee for an Environmental Evaluation per the Planning Department's fee schedule. The Environmental Evaluation Application, Supplemental Information Form for Historical Resource Evaluation and Preservation Bulletin No. 16 are also available online at www.sfplanning.org.

Below is a list of studies that would be required based on our preliminary review of the project as it is proposed in the PPA Submittal dated April 5, 2011:

1. *Transportation Impact Study*. Based on the proposed project, a separate Transportation Impact Study (TIS) would be required as part of the project, based on the Planning Department's *Transportation Impact Analysis Guidelines*, as background for the Negative Declaration or EIR. TIS reports shall be prepared by qualified consultants, working at the direction of the Planning Department staff. The purpose of the transportation study is to provide comprehensive information necessary to identify the transportation issues and impacts of the project (including those of importance and significance), and provide potential solutions or mitigations to problems and significant impacts of the proposed project, in the context of the overall policies and objectives of the City.
2. *Archaeological Resources*. Based on proposed excavation for the project and its location adjacent to the Market and Octavia Area Plan Archeological Mitigation Zone, the proposed project would be subject to Archeological review for potential impacts archeological resources. This process of Archeological review can be divided into three phases: 1) an evaluation that the project will not have the types of effects (soils disturbance/modification) that could affect archeological resources; 2) an evaluation that the project, although having soils disturbing/modifying effects, is within a site not likely to contain archeological resources; and 3) a more definitive evaluation of project archeological resource impacts for those projects in which Phases 1 and 2 have determined that there is the potential for effect and for an archeological resource to be present. Phase 3 evaluation would require the reviewer to have qualifications conforming to the Secretary of the Interior's Professional Standards for archeology. Phase 3 evaluation may determine that additional information/expertise is needed to complete the assessment of archeological effect and will require the project sponsor to retain an appropriate archeological consultant to prepare a technical archeological assessment report.
3. *Historic Resource Evaluation Report (HRER)*. The proposed project consists of demolition of a building constructed 50 or more years ago, therefore, the project is subject to the Department's Historic Preservation review, which would include preparation of a Historic Resource Evaluation Report (HRER) by a qualified consultant. Under CEQA, evaluation of the potential for proposed projects to impact "historical resources" is a two-step process: the first is to determine whether

the property is an “historical resource” as defined in Section 15064.5(a)(3) of CEQA; and, if it is an “historical resource,” the second is to evaluate whether the action or project proposed by the sponsor would cause a “substantial adverse change”. The project site is adjacent to the Western SoMa Light Industrial and Residential Historic District. The Planning Department must determine if the proposed project’s scale, design, or materials are consistent with those of nearby historical resources for the purposes of the California Environmental Quality Act, and if the proposed design is compatible with the potential historic district.

4. *Geotechnical Investigation.* The project site is located in an area of potential geological hazard zone as identified in the San Francisco General Plan. The project site and the area around the project site are within a designated Seismic Hazard Zone identified as an area potentially prone to subsidence. The investigation of geotechnical and soil conditions and the application of the building codes for new development based on these conditions would reduce the potential for project impacts related to structural damage; ground subsidence, liquefaction, and landslides; and surface settlement to a less-than-significant level. To assist Planning Department staff in their determination, it is recommended that you provide a copy of a geotechnical investigation with boring logs for the proposed project. This study will also help inform the archeological review.
5. *Phase I Environmental Site Assessment.* The context of existing environmental hazards in the immediate setting of the project site must be reviewed and the potential of hazards and hazardous materials contamination of the site from past historic uses on the site need to be reviewed. Accordingly, a Phase I ESA needs to be provided as part of the project. If the Phase I ESA determines that there are Recognized Environmental Conditions, a Phase II Study may be required by the Department of Public Health (DPH). If so, it must be completed before completion of environmental review. If project construction has the potential to disturb existing toxins, specific mitigation measures may be required and a Focused Initial Study could be required. If so, the Initial Study will help determine that either (1) the project can be issued a Negative Declaration stating that the project would not have a significant impact on the environment, or (2) an Environmental Impact Report (EIR) is required to determine the project’s significance impact related to hazards/hazardous materials on the environment. DPH is typically able to identify measures, such as preparation of a Site Mitigation Plan, to reduce any significant impacts to a less than significant level, allowing for issuance of a Mitigated Negative Declaration.
6. *Shadow Fan Analysis.* Planning Code Section (“Section”) 295 generally prohibits new buildings that would cast new shadow on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space.

As indicated below in the “Planning Department Approvals” section of this document, Department staff has prepared a preliminary shadow fan analysis to determine whether the proposed 120-foot project could potentially cast shadow on Recreation and Park Department public open space. It does not appear that the project would cast shadow on public open space. However, should the project conditions change, resulting in a shadow fan analysis that indicates

that the project would cast shadow on public open space, further shadow analysis would need to be prepared that includes intervening buildings in order to determine whether the project would create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas pursuant to CEQA, or whether the project would result in an adverse impact to public open space pursuant to Planning Code Section 295.

The Planning Department Environmental Planning Staff also review project's shadow on non-Rec/Park privately owned public open space (POPOS). This is in accordance with the Planning Code Section 147 and the Department's initial study checklist question regarding whether the project would create new shadow that would substantially affect the usability of outdoor recreation facilities and other public areas. Additionally, Planning Code Section 146 requires that buildings be shaped such that they minimize shadow on public sidewalks, if it can be done without creating an unattractive design and without unduly restricting the development potential of the site.

7. *Wind Analysis.* As discussed under the "Planning Department Approvals" section below, the height of the proposed residential building would trigger a wind analysis study in order to ensure that the project will not exceed the comfort criteria (ground level wind levels not to exceed 11mph in areas of substantial pedestrian use or 7mph in public seating areas) established in Section 148 of the Planning Code. Section 148 specifically outlines these criteria for the Downtown Commercial (C-3) Districts, including the project site. The comfort criteria are based on pedestrian-level wind speeds that include the effects of turbulence; these are referred to as "equivalent wind speeds" (defined in the Planning Code as "an hourly mean wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians"). If existing wind speeds exceed the comfort level, or when a project would result in exceedances of the comfort criteria, an exception may be granted, pursuant to Planning Code Section 309, if the building or addition cannot be designed to meet the criteria "without creating an unattractive and ungainly building form and without unduly restricting the development potential" of the site, and it is concluded that the exceedance(s) of the criteria would be insubstantial "because of the limited amount by which the comfort level is exceeded, the limited location in which the comfort level is exceeded, or the limited time during which the comfort level is exceeded." Section 148 also establishes a hazard criterion, which is a 26 mph equivalent wind speed for a single full hour. No exception shall be granted for exceeding a hazardous level.
8. *Air Quality Assessment.* The proposed project is located within a potential roadway exposure zone identified by the Department of Public Health (DPH). Given that the project proposes sensitive land uses in this potential exposure zone, the project requires an air quality assessment to determine if pollutant concentrations are above the threshold level of 0.2 micrograms per cubic meter. You may choose to have the air quality assessment prepared by a qualified firm and forwarded to DPH for review, or you may request that DPH conduct the assessment.

Should you choose to have the air quality assessment prepared by a qualified firm, please forward a description of the proposed project (including project location and a set of plans) and the results of the air quality assessment to Tom Rivard, San Francisco Department of Public

Health, Air Quality Research, Planning and Policy, 1390 Market Street, Suite 210, San Francisco, CA 94102. A fee of \$520 in the form of a check payable to the Department of Public Health for four hours of project review and administrative handling must accompany the assessment.

Should you choose to have DPH prepare the air quality assessment for your proposed project, please forward a description of the project (including project location and a set of plans) to Tom Rivard at the address listed above and a fee of \$1,560 in the form of a check payable to the Department of Public Health. This fee covers 12 hours of preparation of the air quality assessment and administrative handling.

If additional work is necessary, you will be notified by DPH. You will be billed (by DPH) \$130 for each additional hour of work over the first four hours. These fees are charged pursuant to Section 31.47(c) of the San Francisco Administrative Code.

If the air quality assessment finds that concentrations of air pollutants on the site exceed action levels, mitigation measures, outlined in the guidance document, may be required to protect sensitive uses. If the project is subject to Article 38 of the San Francisco Health Code, the actions outlined within that article may be required.

9. *Compliance with Bay Area Air Quality Management District Guidelines.* Screening results indicate that the proposed project would require a preparation of an Air Quality Technical Report (AQTR), which includes a Criteria Air Pollutant analysis and Health Risk Analysis. If the project should include a stationary source, such as a back-up generator, the Criteria Air Pollutant analysis and Health Risk Analysis must include an analysis of both the emissions and health risks from the stationary source and project-generated traffic. Prior to preparation of an AQTR, Environmental Planning must approve a scope of work for air quality analysis. The scope of work may be submitted to the Environmental Planner assigned to the project.

If the project has the potential to expose sensitive receptors to pollutant levels above thresholds set by the Bay Area Air Quality Management District, specific mitigation measures may be required and a Focused Initial Study could be required. If so, the Initial Study will help determine that either (1) the project is issued a Negative Declaration stating that the project would not have a significant effect on the environment, or (2) an Environmental Impact Report (EIR) is required to determine the project's significance on the environment. DPH is typically able to identify measures to reduce any significant impacts to a less than significant level, allowing for issuance of a Mitigated Negative Declaration.

10. *Greenhouse Gas Analyses.* The 2010 CEQA Air Quality Guidelines provide for the first time CEQA thresholds of significance for greenhouse gas emissions. On August 12, 2010, the San Francisco Planning Department submitted to the BAAQMD a draft of the City and County of San Francisco's *Strategies to Address Greenhouse Gas Emissions*. This document presents a comprehensive assessment of policies, programs and ordinances that collectively represent San Francisco's Qualified Greenhouse Gas Reduction Strategy. The BAAQMD reviewed San Francisco's GHG reduction strategy and concluded that the strategy meets the criteria for a

Qualified GHG Reduction Strategy as outlined in BAAQMD's CEQA Guidelines (2010).¹ Therefore, projects that are consistent with San Francisco's GHG reduction strategy would result in less than significant GHG emissions.

In order to facilitate a determination of compliance with San Francisco's GHG reduction strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist. Projects that are seeking a determination of CEQA GHG significance based on compliance with San Francisco's GHG reduction strategy must complete the Greenhouse Gas Analysis Compliance Checklist. The planner or CEQA consultant in coordination with the project sponsor can prepare this checklist.

11. *Compliance with Stormwater Management Ordinance.* The City and County of San Francisco Stormwater Management Ordinance (SMO) became effective on May 22, 2010. This ordinance requires that any project resulting in a ground disturbance of 5,000 square feet or greater prepare a Stormwater Control Plan (SCP), consistent with the November 2009 Stormwater Design Guidelines (SDG). Responsibility for review and approval of the SCP is with the SFPUC Wastewater Enterprise, Urban Watershed Management Program (UWMP).

The initial CEQA evaluation of a project will broadly discuss how the SMO will be implemented if the project triggers compliance with the Stormwater Design Guidelines (SDG). The project's environmental evaluation would generally evaluate how and where the implementation of required stormwater management and Low Impact Design (LID) approaches would reduce potential negative effects of stormwater runoff. This may include environmental factors such as the natural hydrologic system, city sewer collection system, and receiving body water quality.

12. *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. Any tree identified in this Disclosure Statement must be shown on the Site Plans with size of the trunk diameter, tree height, and accurate canopy dripline. Please submit an Affidavit with the Environmental Evaluation Application and ensure trees are appropriately shown on site plans.

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.

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 San Francisco's *Strategies to Address Greenhouse Gas Emissions* and BAAQMD's letter are available online at: <http://www.sfplanning.org/index.aspx?page=1570>.

1. *Determination of Compliance – Section 309.* New construction and major alteration projects in the C-3-S District require a Determination of Compliance (Section 309 Review). As a component of the review process under Planning Code Section 309, projects may seek specific exceptions to the provisions of the Planning Code. The following exceptions must be justified – through the specific findings outlined for each exception – as part of the Section 309 review in order for the proposed project to be approved:
 - a. Rear Yard (Section 134(a)(1)(C) and 134(d)). The Planning Code requires a rear yard measuring 25% of the lot depth at every level of the building containing residential units. The project does not meet this requirement.
 - b. Bulk (Section 272). The project does not comply with the “F” Bulk limitations of the property, which require a maximum length of 110’-0” and maximum diagonal dimension of 140’-0”. The Project would result in a length of 113’-4” and diagonal dimension of 139’-0”. The Bulk limitations can be modified through a 309 exception, if certain findings can be made.
 - c. Wind (Section 148). As mentioned under the Environmental Review section above, a wind analysis will be required for the proposed project. If the wind analysis determines that the project will result in exceedances to the wind comfort levels outlined in Section 148 (ground-level winds exceeding 11mph for pedestrians and 7mph for public seating areas), an exception may be sought under Planning Code Section 309, if the following findings in Section 148 can be made:
 - (i) it can be shown that a building or addition cannot be shaped and other wind-baffling measures cannot be adopted to meet the foregoing requirements without creating an unattractive and ungainly building form and without unduly restricting the development potential of the building site in question, and
 - (ii) it is concluded that, because of the limited amount by which the comfort level is exceeded, the limited location in which the comfort level is exceeded, or the limited time during which the comfort level is exceeded, the addition is insubstantial.

Please note that exceedances to the hazardous wind levels of 26mph cannot be modified under Section 309.

Based on subsections above, a Downtown Project Authorization is required. The application form is available from 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.

2. *Variances.* The proposed project would require variances from the following Planning Code Sections. Please note that there are five variance criteria outlined in Planning Code Section 305, that must be met for each requested variance:
 - a. *Open Space (Section 135).* The project requires 36sf of private usable open space or 47.88sf of common usable open space for each of the 200 dwelling-units. The project indicates that there will be approximately 6,200sf of common open space, 1,700 of which does not meet the sun access dimensions outlined in Section 135(g)(2). The Code requires 7,200sqft of private usable open space or 9,576sf of common usable open space for the building. If an exception to open space will be sought, the Department recommends providing

update your FAR calculations to take the bicycle parking into account, and seek TDR to achieve up to 7.5:1 FAR.

6. *Shadow Analysis (Section 295)*. As discussed in the “Environmental Review” section of this document, projects over 40’-0” in height require a Shadow Analysis Application under Section 295 (“Proposition K”) to ensure that new buildings do not cast new shadows on properties that are under the jurisdiction of the San Francisco Recreation and Park Department. A preliminary shadow analysis was conducted based on the plans submitted as part of the PPA Application, which indicated that there would not be any shadows cast on properties under the jurisdiction of the Recreation and Park Department. Nonetheless, a Shadow Analysis Application must be filed in order to document that the project will not cast any shadows on Recreation and Park properties.
7. *Streetscape Plan (Section 138.1(c)(2))*. The Project encompasses the entire block frontage between 9th Street and Washburn Street, and as such, requires the submittal of a Streetscape Plan to the Planning Department to ensure that the new streetscape and pedestrian elements are in conformance with the Department’s Better Street Plan. This Streetscape Plan shall be submitted to the Planning Department no later than 60 days prior to any Planning Commission action, and shall be considered for approval at the time of other project approval actions. The streetscape plan should show the location, design, and dimensions of all existing and proposed streetscape elements in the public right-of-way directly adjacent to the fronting property, including street trees, sidewalk landscaping, street lighting, site furnishings, utilities, driveways, and curb lines, and the relation of such elements to proposed new construction and site work on the property. Please see the Department’s Better Streets Plan and Section 138.1(c)(2)(ii) for the additional elements that may be required as part of the project’s streetscape plan.
8. *Public Art (Section 429)*. Planning Code Section 429(a) requires public art for new construction projects in the C-3 District over 25,000sqft. The public art must be valued at least 1% of the construction cost.
9. *Model Required (Section 429)*. Pursuant to Planning Code Section 429(c), two models are required for the proposed project. (1) One model of the building at a scale of 1” = 100’; and (2) One model of the block in which the building is located at a scale of 1” = 32’, which model shall include all the buildings on the block on which the building is located and the streets surrounding the block to the centerline of the streets and shall use as its base the land form starting at sea level; provided, however, that if the Planning Department determines that it has an up-to-date model of the block in which the building is located, only a model of the building shall be submitted. Please note that recent practice has been to allow photo montages of the subject project in context with surrounding buildings in lieu of the 3-D models; however, this too will need to be to an appropriate scale.
10. *Street Tree Removal*. The Project appears to include the removal of five street trees. Their removal would be subject to the Department of Public Work’s Street Tree Removal process. For more information on subdivisions contact:

The Department of Public Works
Bureau of Urban Forestry

2323 Cesar Chavez Street
San Francisco, CA 94124
Phone: 415.554.6700

11. *Building Permit Applications.* A Building Permit application is required for the demolition of the existing building and for the proposed new construction. Building permit applications are available at the Department of Building Inspection 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 – such as the 309 and Conditional Use requests – 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.

Although this project is not required to conduct a Pre-application meeting with surrounding neighbors and registered neighborhood groups before the development applications are filed with the Planning Department, it is highly recommended. The Pre-application packet, which includes instructions and template forms, is available at www.sfplanning.org under the “Applications” tab. All registered neighborhood group mailing lists and maps are available online at www.sfplanning.org under the “Publications” tab.

PRELIMINARY PROJECT COMMENTS:

The following comments address general issues that may significantly impact the proposed project:

1. The Planning Department is supportive of a wide range of housing projects and housing types. The 2009 Housing Element includes objectives and policies that support a wide range of housing types across all lifecycles (Objective 4). At the same time, the General Plan balances the need for housing production and the need to assure its livability (Objective 11). In this light, it will be important for this project to convey that the proposed housing will provide sufficient amenities for intended users, including but not limited to access to sun and light, adequate open space and other amenities. This is particularly important given the multitude of exceptions being sought.
2. *Transit Impact Development Fee (Section 411).* The project is not a principally permitted project in a C District, and is therefore required to pay TIDF.
3. *Affordable Housing (Section 415).* The 30 on-site affordable dwelling-units proposed as part of this Project must be designated as owner-occupied units, not rental units. The Project Sponsor must submit an ‘Affidavit of Compliance with the Inclusionary Affordable Housing Program: Planning Code Section 415,’ to the Planning Department stating that any affordable units designated as on-site units shall be sold as ownership units and will remain as ownership units for the life of the project. Please note that conversion of the dwelling-units to student housing (a possibility noted by the Project Sponsor) prohibits the reduction or elimination of the existing on-site affordable dwelling-units; the on-site affordable dwelling-units may, however, be relocated

to an equal or “better” location within the building (typically higher floor) and must be of an equal size.

4. *First Source Hiring*. Chapter 83 of the San Francisco Administrative Code, passed in 1998, established the First Source Hiring Program to identify available entry-level jobs in San Francisco and match them with unemployed and underemployed job-seekers. The intent is to provide a resource for local employers seeking qualified, job ready applicants for vacant positions while helping economically disadvantaged residents who have successfully completed training programs and job-readiness classes.

The ordinance applies to (1) any permit application for commercial development exceeding 25,000 square feet in floor area involving new construction, an addition or a substantial alteration which results in the addition of entry level positions for a commercial activity; or (2) any application which requires discretionary action by the Planning Commission relating to a commercial activity over 25,000 square feet, but not limited to conditional use; or (3) any permit application for a residential development of ten units or more involving new construction, an addition, a conversion or substantial rehabilitation.

The project proposes more than ten dwelling units and therefore, is subject to the requirement. For further information or to receive a sample First Source Hiring Agreement, please see contact information below:

Ken Nim, Workforce Compliance Officer
CityBuild, Office of Economic and Workforce Development
City and County of San Francisco
50 Van Ness, San Francisco, CA 94102
Direct: 415.581.2303
Fax: 415.581.2368

PRELIMINARY DESIGN COMMENTS

The following comments address preliminary design issues that may influence the submittal of the proposed project:

1. *Ground floor frontage*: The proposed retail frontage presents itself as a single uninterrupted storefront built to the edge of the property line. Please consider the following changes at the ground floor: (1) more entrance doors along Mission and 9th Streets; (2) punctuate the retail frontage into logical modules for future sub-division of smaller tenant spaces; (3) scale the storefront design vertically or horizontally; and (4) allow sidewalk space adjacent to the frontage to be usable – perhaps by setting storefront back a couple feet to allow for seating.
2. *Courtyard open space*: The courtyard open space is insufficiently wide to allow for sun access and exposure to the courtyard and lower level courtyard-facing units. Project sponsor should consider widening the courtyard and/or providing a setback at upper-level units to create a wider solar access fan. The Department would like to see greater common and private open space. Consider providing individual terraces and balconies.

3. *Massing*: (1) The single roof height and massing should step down toward the adjacent southern property to transition to the lower scale. (2) The façade needs more attention to the articulation and scale; these elements could provide a stronger vertical definition to the building if they were more varied in depth and width.
4. *Architecture*: The proposed architectural design is bulky, repetitive, and lacks appropriate scale for the surrounding context. To compensate for the requested Planning Code exceptions, the architecture should be superior. Materials to be selected may help, although the massing and façade treatment needs more detail and articulation. Moderate the massing by breaking the bays, altering the bays in depth and height, stepping the roof massing, and by making the scale, proportion, and detail of the bays and windows more refined.

PRELIMINARY PROJECT ASSESSMENT EXPIRATION:

This Preliminary Project Assessment is valid for a period of **18 months**. An Environmental Evaluation, Certificate of Appropriateness, Large Project Authorization, Variance Application, or Building Permit Application, as listed above, must be submitted no later than **November 24, 2012**. Otherwise, this assessment 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.

cc: Elizabeth Watty, Current Planning
Brett Bollinger, Environmental Planning
Mat Snyder, Long-Range Planning
David Winslow, Design Review Team

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