



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: August 26, 2011
TO: John M. Sanger, Sanger & Olson
FROM: Nannie Turrell, Planning Department
RE: PPA Case No. 2011.0671U for 1395 22nd Street and 790
Pennsylvania Avenue

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

Reception:
415.558.6378

Fax:
415.558.6409

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415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Andrea Contreras, at (415) 575-9044 or andrea.contreras@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

A handwritten signature in cursive script that reads "Nannie Turrell".

Nannie Turrell, Senior Planner



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: August 25, 2011
Case No.: **2011.0671U**
Project Address: 1395 22nd Street/790 Pennsylvania Avenue
Block/Lot: 4167/011 and 013
Zoning: UMU (Urban Mixed Use) and PDR-1-G (General Production, Distribution, and Repair) Use Districts
40-X Height and Bulk District
Project Sponsor: John M. Sanger, Sanger and Olson
(415) 693-9300
Staff Contact: Andrea Contreras – (415) 575-9044
andrea.contreras@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 project site consists of two irregularly shaped parcels (Assessor's Block 4167, Lots 11 and 13) in the Potrero Hill neighborhood of the Eastern Neighborhoods Rezoning and Area Plan. Lot 11 fronts Pennsylvania Avenue and Lot 13 fronts 22nd Street. The site is currently occupied by 74,500 square feet (sq. ft.) of commercial storage.

The proposal is to construct a mixed-use building with approximately 282,000 sq. ft. of residential use above approximately 80,000 sq. ft. of commercial storage. The building would be 10 stories over basement. Lot 11 would contain three levels of parking capped by a common deck area. Lot 13 would contain commercial storage and parking at the basement level, residential parking at grade, and ten levels of residential use. The project sponsor is proposing 276 dwelling units, 272 parking spaces, and 6 loading spaces.

ENVIRONMENTAL REVIEW:

Pursuant to the California Environmental Quality Act (CEQA), this project is likely to qualify for a Community Plan Exemption under the Eastern Neighborhoods Rezoning and Area Plan. An **Environmental Evaluation Application** is required for the full scope of the project. To determine fees for environmental review, please refer to page one of our fee schedules, under "Studies for Project inside of Adopted Plan Areas – Community Plan Fees." If a Focused Initial Study and a Negative Declaration or Focused Environmental Impact Report (EIR) is required, additional fees would be assessed based on construction cost. Results of the studies below will determine whether a Focused Initial Study and a Negative Declaration or Focused EIR is required.

The project initially requires the following environmental review based on our preliminary review of the project as it is proposed in the PPA Application dated June 27, 2011. This review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted:

- a. *Potential Archeological Mitigation.* Archeological studies are generally not required unless the project includes grading or foundation work of a depth of five feet or more. If the site is found to be sensitive, less ground disturbance may trigger mitigation requirements. As stated in the Eastern Neighborhoods Rezoning and Area Plan Final EIR ("Eastern Neighborhoods FEIR"), implementation of the following mitigation measure can reduce the potential adverse effect on archeological resources of the project area to a less-than-significant level. Since the Eastern Neighborhoods FEIR was programmatic and did not analyze specific development projects in the project area, specific physical project evaluations would undergo individual environmental review in accord with Mitigation Measure J-2: Properties with No Previous Studies. This measure applies to properties in the Eastern Neighborhoods for which no archeological assessment report has been prepared or for which the archeological documentation is incomplete or inadequate to serve as an evaluation of the potential effects on archeological resources under CEQA. This measure applies to the entirety of the study area outside of Archeological Mitigation Zones A and B. The project site is outside Archeological Mitigation Zones A and B and a Preliminary Archeological Sensitivity Study must be prepared by an archeological consultant with expertise in California prehistoric and urban historical archeology. The Sensitivity Study should: 1) determine the historical use of the project site based on any previous archeological documentation and Sanborn maps; 2) determine types of archeological resources/properties that may have been located within the project site and whether the archeological resources/property types would potentially be eligible for listing in the California Register of Historical Resources (CRHR); 3) determine if 19th or 20th century soils-disturbing activities may have adversely affected the identified potential archeological resources; 4) assess potential project effects in relation to the depth of any identified potential archeological resource; and 5) assess whether any CRHP-

eligible archeological resources could be adversely affected by the proposed project and recommend appropriate further action.

- b. *Transportation Study.* A Transportation Study requirement is anticipated. The construction of residential use indicates additional peak hour trip potential that requires analysis. Additionally, circulation changes need to be reviewed. Please refer to the requirements for Transportation Study applications on our website and submit the application with the other filings.
- c. *Noise.* The project is not expected to result in any peculiar impacts not identified in the Eastern Neighborhoods FEIR, especially if Noise Mitigation Measure F-1 and F-2 (Construction Noise) are applied. Application of one of these mitigation measures would reduce any construction-related impacts to a less-than-significant level. Mitigation Measure F-4: Siting of Noise-Sensitive Uses would apply as the project sponsor is proposing to site residential use in UMU and PDR-1-G Use Districts. This would require the sponsor to identify potential noise-generating uses within 900 feet of, and have direct line-of-sight to the project site, and include at least one 24-hour noise measurement with maximum noise level readings taken at least every 15 minutes. Mitigation Measure F-6: Open Space in Noisy Environments would also apply in order to protect the project's common open space from existing ambient noise levels. This could include site design that uses the building itself to shield on-site open space from the greatest noise sources and/or construction of noise barriers between noise sources and open space.
- d. *Compliance with Bay Area Air Quality Management District Guidelines.* Based on the Department's Preliminary Air Quality Screening, the proposed project would be required to prepare an Air Quality Technical Report (AQTR). The AQTR must include a criteria air pollutant analysis for construction and an operational criteria air pollutant analysis since the project includes stationary sources. The report must also include an analysis of health risks. The health risk analysis should include the impact of construction activities on off-site sensitive receptors and the impact of any operational sources (generators, boilers and project generated traffic) on both off-site and on-site sensitive receptors. The report must also include an analysis of off-site sources (high volume roadways, permitted and non-permitted sources) on on-site sensitive receptors. The report should further evaluate what additional non-permitted sources are within 1,000 feet of the project site in addition to Cresco Equipment Rentals, San Francisco Food Bank, and Silver Sprouts Company.

Since the project includes at least one stationary source (i.e., back-up generator or boiler) the criteria air pollutant 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 an AQTR, Environmental Planning must approve a scope of work for the air quality analysis. The scope of work may be submitted to the Environmental Review Coordinator assigned to the project.

- e. *Article 38 Air Quality Assessment.* Article 38 of the San Francisco Health Code requires that for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by DPH, an Air Quality Assessment be prepared to determine whether residents would be exposed to potentially unhealthful levels of PM_{2.5}. Through air quality modeling, an assessment is conducted to determine if the annual average concentration of PM_{2.5} from the roadway sources would exceed a concentration of 0.2 micrograms per cubic meter. If this standard is exceeded, the project sponsor must install a filtered air supply system, with high-efficiency filters, designed to remove at least 80 percent of ambient PM_{2.5} from habitable areas of residential units.

The project site at 1395 22nd Street/790 Pennsylvania Avenue is located within the Potential Roadway Exposure Zone, as mapped by DPH. Pursuant to Article 38 of the San Francisco Health Code, the project sponsor shall prepare an Air Quality Assessment consistent with Department of Public Health (DPH) guidance. This analysis may be conducted separately by DPH or as part of the Air Quality Technical Report (see *Compliance with Bay Area Air Quality Management District Guidelines*, above).

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. The current fee 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.

If additional work is necessary, you will be notified by DPH. You will be billed (by DPH) 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.

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 the current fee 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.

- f. *Shadow Fan Analysis.* Planning Code 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. If the project's height is over 40 feet, a shadow fan analysis would be required.

- g. *Geotechnical Investigation.* The project site is located near or within an area subject to liquefaction potential, a Seismic Hazards Study Zone designated by the California Division of Mines and Geology. The investigation of geotechnical and soil conditions and the application of the building codes for new development based on these conditions could reduce the potential for impacts related to structural damage and surface settlement to a less-than-significant level. To assist our staff in their determination, it is recommended that you provide a copy of a geotechnical investigation with boring logs for the proposed project.
- h. *Compliance with Stormwater Management Ordinance.* The City and County of San Francisco Stormwater Management Ordinance 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, consistent with the November 2009 Stormwater Design Guidelines. Responsibility for review and approval of the Stormwater Control Plan is with the San Francisco Public Utilities Commission (SFPUC) Wastewater Enterprise, Urban Watershed Management Program.

The initial CEQA evaluation of a project will broadly discuss how the Stormwater Management Ordinance will be implemented if the project triggers compliance with the Stormwater Design Guidelines. The project's environmental evaluation would generally evaluate how and where the implementation of required stormwater management and Low Impact Design 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.

- i. *Further Information Regarding Site History.* No information exists in the Department's Parcel Information Database regarding the year built of the structures on site. Further information regarding the age of the existing development is required. If the structures on site were constructed over 50 years ago they may be considered a potential historic resource and would require further analysis. If further analysis is needed, you would be required to use the pre-qualified Historic Resource Consultant Pool. According to the consultant pool process, you may select a consultant from a subset of three consultants chosen by the Planning Department. If necessary, Tina Tam can be reached at (415) 558-6325 for questions regarding administration of the Historic Resource Consultant Pool.
- j. *Phase I Environmental Site Assessment.* The context of existing environmental hazards in the immediate setting must be reviewed and a Phase I ESA needs to be provided.

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. If so, it must be completed before environmental clearance. 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 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, 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.

- k. *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 drip line. Please submit an Affidavit with the Environmental Evaluation Application and ensure trees are appropriately shown on site plans.
- l. *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 at the initiation of the Community Plan Exemption process. Please provide these mailing labels at the time of submittal.

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. Additionally, these approvals are subject to the Planning Department Pre-application process:

1. *Large Project Authorization (X).* Planning Code Section 329 applies to all new construction and proposed alterations of existing buildings in the Eastern Neighborhoods that meet at least one of the following criteria:
 - a. The project includes the construction of a new building greater than 75 feet in height (excluding any exceptions permitted per Section 260(b)), or includes a vertical addition to an existing building resulting in a total building height greater than 75 feet; or
 - b. The project involves a net addition or new construction of more than 25,000 gross square feet; or

- c. The project has 200 or more linear feet of contiguous street frontage on any public right of way.

The project meets Criteria 1b above with approximately 435,500 gross square feet of area. Therefore, a Large Project Authorization, or X case, 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. *Exceptions.* As a component of the review process under Section 329, projects may seek specific exceptions to the provisions of the Planning Code. Exceptions from dwelling unit exposure (Planning Code Section 140) must be justified in order for the project to be approved because approximately 27 percent of the 276 proposed units, or 74 units, do not face a street or qualified rear yard. Therefore, these units do not meet the exposure requirement. Please consider revising the project design and program to provide code-complying exposure to the units.
3. *Building Permit Application.* Permit application and notification are required for the proposed new construction and the Large Project Authorization. Building permit applications are available at the Department of Building Inspection at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATION:

The project sponsor is encouraged to conduct public outreach early in the development process. Neighborhood notification per Planning Code Section 312 will be combined with the noticing process of the Large Project Authorization. Therefore, noticing materials for owners and occupants with 300-foot radius and occupants within 150-foot radius of the project site are required at the time of project intake.

Pre-application meeting is also required with surrounding neighbors and registered neighborhood groups before a development application may be filed with the Planning Department. The Pre-application packet, which includes instructions and template forms, is available at www.sfplanning.org under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at www.sfplanning.org under the "Resource Center" tab.

PRELIMINARY PROJECT COMMENTS:

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

1. **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

2. **Use.** Self-storage is not a permitted use under Planning Code Sections 225 and 843.48 for UMU and PDR-1-G zoning districts. Please clarify the proposed storage use and identify any potential tenants.
3. **Stormwater Design Guidelines.** Projects that disturb 5,000 square feet or more of the ground surface must comply with the Stormwater Design Guidelines and submit a Stormwater Control Plan to the SFPUC for review. To view the Guidelines and download instructions for preparing a Stormwater Control Plan, go to <http://stormwater.sfwater.org/>. Please contact stormwaterreview@sfwater.org for assistance or additional information.
4. **Standards for Bird-Safe Buildings.** The newly adopted guidelines for providing bird-safe buildings identify location and feature related hazards and treatment requirements. Please refer to the published document "Standards for Bird Safe Buildings, Adopted 7-14-2011" on the Planning Department website for details and specific requirements:

[http://www.sf-planning.org/ftp/files/publications reports/bird safe bldgs/Standards for Bird-Safe Buildings 8-11-11.pdf](http://www.sf-planning.org/ftp/files/publications%20reports/bird%20safe%20bldgs/Standards%20for%20Bird-Safe%20Buildings%208-11-11.pdf)
5. **Streetscape Improvements.** Planning Code Section 138.1 requires one street tree per 20 feet of street frontage for additions of gross floor area equal to 20 percent or more of the gross floor area of an existing building. The proposed project triggers a requirement for four street trees for frontage on Missouri Street, four trees for the frontage on Texas Street and four trees for the frontage on Pennsylvania Avenue.

6. **Tree Disclosure Affidavit.** A Tree Disclosure Affidavit must be filled out and submitted with the Large Project Authorization application.
7. **Dwelling Unit Exposure.** Every dwelling unit in every use district is required per Planning Code Section 142 to face either a public street, a public alley at least 25 feet in width, a rear yard meeting the requirements of the Planning Code, or an open area at least 25 feet in every horizontal dimension for the floor at which the dwelling unit in question is located and the floor immediately above it, with an increase in five feet in every horizontal dimension at each subsequent floor.

Although the rear yard on the Project Site would provide all west facing units with adequate light and air, the east facing units face onto adjacent Lots 7 and 9, and not onto a street or qualifying rear yard or open space. Specifically, approximately 27 percent of the 276 proposed units, or 74 units, do not meet the exposure requirement. For new construction on a sizable lot, an open space that complies with the dimensional requirements for dwelling unit exposure to minimize the number of units requiring this exception should be accommodated.

8. **Off-Street Loading Spaces.** Planning Code Section 152.1 requires two off-street loading spaces for a project proposing a residential use between 200,001 to 500,000 square feet. The project proposes approximately 241,700 square feet of residential use; therefore, two loading spaces are required.
9. **Car Share Spaces.** Planning Code Section 166 requires two car share spaces for the proposed project with 200 dwelling units or more plus 1 for every 200 dwelling units over 200. Additionally, a project that proposes 25 - 49 parking spaces for non-residential uses or in a non-accessory parking facility is required to provide one car share space. The project proposes a total of 276 dwelling units and 38 parking spaces for non-residential uses. Please see comments on the self-storage use. Therefore, three car share spaces are required.
10. **Height Measurement.** Planning Code Section 102.12(d) allows the owner to choose the street or streets from which the measurement of height is to be taken where the lot has frontage on two or more streets, if the scope of the rules stated in subsections (a) – (c) are followed. The project proposes to take the height measurement at the Missouri Street frontage, which is currently an unfinished paper street. The selection of this street frontage allows an over 100-foot tall proposed building at the top of the hill. The result is a proposal that overshadows the adjacent lots to the west and creates an approximately 581-foot wide building wall over 100 feet tall in a 40-foot height district. In order to better relate to the topography of the site and the residential developments adjacent to the top of the hill/site, the Department discourages the proposed height measurement selection and recommends a building height no higher than the top of the hill with reference to the datum point of 120-foot as illustrated on submitted Sheet A5.1.

11. **Impact Fees.** The Eastern Neighborhoods Public Benefits Fund is implemented in part through district-specific Eastern Neighborhoods Impact Fee which applies to the Project Area. Fees shall be charged on net additions of gross square feet which result in a net new residential unit, contribute to a 20 percent increase of non-residential space in an existing structure, or create non-residential space in a new structure. Fees shall be assessed on residential use, and on non-residential use within each use category of Cultural/Institution/Education; Management, Information & Professional Service; Medical & Health Service; Retail/Entertainment; and Visitor Services; with no substitutions across uses. Fees shall be assessed on mixed use projects according to the gross square feet of each use in the project. The project is within the Impact Fee Tier 1, which requires \$8 per gross square-foot of residential space and \$6 per gross square-foot of non-residential space.

Prior to the issuance by the Department of Building Inspection (DBI) of the first site or building permit for a residential development project, or residential component of a mixed use project within the Project Area, the sponsor of any project containing residential space subject to the Eastern Neighborhoods Impact Fee shall pay to the Treasurer according to the schedule in Table 423.3. Planning Code Section 423.3 also provides alternatives satisfying this requirement.

12. **Inclusionary Housing.** Affordable housing is required for a project proposing five or more dwelling units. The Project Sponsor must submit an 'Affidavit of Compliance with the Inclusionary Affordable Housing Program: Planning Code Section 415', to the Planning Department identifying the method of compliance, on-site, off-site, or in-lieu fee. Any on-site affordable dwelling-units proposed as part of the project must be designated as owner-occupied units, not rental units. 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. The subject site is listed as Tier A within the affordable housing requirement; therefore, 18 percent of total proposed dwelling units must be designated affordable.

For your information, if a project proposes rental units, it may be eligible for an On-site Alternative to the Affordable Housing Fee if it has demonstrated to the Planning Department that the affordable units are either: 1) ownership only or 2) not subject to the Costa Hawkins Rental Housing Act (a Costa Hawkins exception). Affordable units are not subject to the Costa Hawkins Rental Housing Act under the exception provided in Civil Code Sections 1954.50 through one of the following methods:

- a. direct financial construction from a public entity
- b. development bonus or other form of public assistance

A Costa Hawkins exception agreement is drafted by the City Attorney. You must state in your submittal how the project qualifies for a Costa Hawkins exception. The request should be addressed to Kelley Amdur, Director of Current Planning. If the project is deemed eligible, we may start working with the City Attorney on the agreement.

GENERAL PLAN COMMENTS:*Showplace Square/Potrero Hill Area Plan*

The proposed project is within two distinct zoning districts: 1395 22nd Street (Block 4167, Lot 13) is in the UMU zoning district; 790 Pennsylvania Avenue (Block 4167, Lot 11) is in the PDR-1-G district. In the Showplace Square / Potrero Hill Area Plan, this project does not fall within any of the key specific zoning areas of emphasis. However, the site is adjacent to the emphasis area for the Potrero Public Housing project. On the generalized zoning map, the general thrust for this particular area is to maintain the existing zoning until after the conclusion of an upcoming process for redevelopment of this area under the HopeSF program. Rezoning of the public housing site and parcels in the immediate vicinity should be considered as appropriate based on the results of the planning process.

Urban Mixed Use (UMU) District

The Showplace Square and Potrero Hill Area Plan proposes a variety of objectives and policies. Most of the policies are relevant to the type of use being proposed. Since the larger parcel of this project is zoned UMU, the following policies for residential development are applicable to the proposed project:

- POLICY 1.2.1 - *Ensure that in-fill housing development is compatible with its surroundings.* There is a large residential project directly to the north of the proposed site.
- POLICY 1.2.2 - *In general, where residential development is permitted, control residential density through building height and bulk guidelines and bedroom mix requirements.* The project proposes 276 dwelling units. However, for reasons stated in the previous section, controlling density through the relevant height as measured in the proposed project is problematic. The proposed project has two-bedroom units making up 49% of the units, exceeding the 40% required by the Code.
- POLICY 2.2.5 - *Facilitate the redevelopment of the Potrero View Public Housing through the HopeSF program.* This policy is relevant in that the proposed project should take into consideration what is being proposed for the new Potrero public housing rebuild and not what does currently exist. There may be opportunities for better connections to the new HopeSF proposal than are currently being proposed. For example, the portion of the project that would have been 22nd Street had 22nd Street been extended up Potrero Hill could be used to connect the upper and lower areas of Potrero Hill.
- POLICY 2.3.3 - *Require that a significant number of units in new developments have two or more bedrooms, except Senior Housing and SRO developments.* The proposed project has two-bedroom units making up 49% of the units, exceeding the 40% required by the Code.

Production, Distribution, and Repair Use (PDR) District

The Showplace Square and Potrero Hill Area Plan also contains policies related to the PDR-zoned portion of the project:

- POLICY 1.7.2 - *Ensure that any future rezoning of areas within PDR districts is proposed within the context of periodic evaluation of the city's needs for PDR space or in the context of the*

redevelopment of nearby public housing in conjunction with the HopeSF program. The PDR portion of the project is proposed for storage. However, the Code requires that this be for commercial storage, not self-storage.

Design and Other Project-wide Considerations

The Showplace Square and Potrero Hill Area Plan also contains policies related to the overall design, massing, and siting for proposed projects as follows:

- POLICY 3.1.1 - *Adopt heights that are appropriate for Showplace Square's location in the city, the prevailing street width and block pattern, and the anticipated land uses; while respecting the residential character of Potrero Hill.* The proposal is much larger than those typically seen on Potrero Hill. Consequently, a 40-foot height limit was adopted for the proposed project's site.
- POLICY 3.1.2 - *Development should respect the natural topography of Potrero Hill.* It is not clear that the project as proposed respects the topography of Potrero Hill.
- POLICY 3.1.4 - *Heights should reflect the importance of key streets in the city's overall urban pattern, while respecting the lower scale development on Potrero Hill.* There should be some consideration of converting the 22nd Street portion of the project to continue the traditional street pattern on Potrero Hill as well as provide a connection to the new street grid proposed by the HopeSF project for the Potrero Hill public housing rebuild.
- POLICY 3.1.5 - *Respect public view corridors. Of particular interest are the east-west views to the bay or hills, and several north-south views towards downtown and Potrero Hill.* The project as proposed would impact east-west views from housing further up Potrero Hill.
- POLICY 3.1.6 - *New buildings should epitomize the best in contemporary architecture, but should do so with full awareness of, and respect for, the height, mass, articulation and materials of the best of the older buildings that surrounds them.* The height, mass, and articulation of the project as proposed would be much different than the buildings in the vicinity of the project in terms of scale.
- POLICY 3.1.8 - *New development should respect existing patterns of rear yard open space. Where an existing pattern of rear yard open space does not exist, new development on mixed-use-zoned parcels should have greater flexibility as to where open space can be located.* There is not an existing pattern of rear yard open space near the proposed project; the project seems to generally satisfy the open space requirements.
- POLICY 3.2.7 - *Strengthen the pedestrian network by extending alleyways to adjacent streets or alleyways wherever possible, or by providing new publicly accessible mid-block rights of way.* The project should consider additional connections, whether alleyways or stairways, to the development that will be occurring in the Potrero Hill public housing rebuild. For example, new stairways or the extension of 22nd Street up the hill from the project would strengthen the pedestrian network.
- POLICY 4.5.2 - *As part of a development project's open space requirement, require publicly-accessible alleys that break up the scale of large developments and allow additional access to buildings in the project.* The project as proposed could benefit from some breakup in the massing which could be used as alleyways.

Urban Design Element

Listed below are some of the policies from the Urban Design Element of General Plan that relate to this project and define the intent of what is appropriate in this situation:

- POLICY 1.1 - *Recognize and protect major views in the city, with particular attention to those of open space and water.* Views contribute immeasurably to the quality of the city and to the lives of its residents. Protection should be given to major views whenever it is feasible, with special attention to the characteristic views of open space and water that reflect the natural setting of the city and give a colorful and refreshing contrast to man's development. Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations. Visibility of open spaces, especially those on hilltops, should be maintained and improved, in order to enhance the overall form of the city, contribute to the distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets.
- POLICY 3.4 - *Promote building forms that will respect and improve the integrity of open spaces and other public areas.* New buildings should not block significant views of public open spaces, especially large parks and the Bay. Buildings near these open spaces should permit visual access, and in some cases physical access, to them.
- POLICY 3.6 - *Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.* When buildings reach extreme bulk, by exceeding the prevailing height and prevailing horizontal dimensions of existing buildings in the area, especially at prominent and exposed locations, they can overwhelm other buildings, open spaces and the natural land forms, block views and disrupt the city's character. Such extremes in bulk should be avoided by establishment of maximum horizontal dimensions for new construction above the prevailing height of development in each area of the city.

The apparent bulk of a building depends primarily upon two factors: the amount of wall surface that is visible, and the degree to which the structure extends above its surroundings. Accordingly, a plan seeking to avoid excessive bulkiness must consider the existing scale of development in each area of the city and the effects of topographic form in exposing building sites to widespread view.

The largest potential building sites present the greatest problems and challenges for moderation of building form. On these sites, normal controls over the form and intensity of construction that are intended primarily for smaller sites have less precision, and the external effects of large developments upon the surrounding area and upon the city may be far greater. The stakes are high for both the developers and the future of the city, with a resulting tendency toward controversy and frustration, and unfortunate divisive effects in the community. For these reasons, the larger sites require separate and more intensive consideration in policies relating to building form. The following considerations should be taken:

- Extremely massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city.
- Buildings which meet the ground and reflect the slope of the hill relate to the land form.
- A long or wide building becomes excessively bulky in appearance when its height significantly exceeds that of buildings in the surrounding area.
- A bulky building creates the most visual disruption when seen from a distance as the dominant silhouette against a background and/or foreground of much smaller structures.
- Bulky buildings that intrude upon or block important views of the Bay, Ocean or other significant citywide focal points are particularly disruptive.

PRELIMINARY DESIGN COMMENTS:

The following comments address preliminary design issues that may significantly affect the project as it is proposed:

The site is a long and narrow, largely interior-block lot on the eastern side of Potrero Hill. It has a very small frontage along Pennsylvania Avenue (this frontage is zoned PDR) and also fronts two termination points of 22nd Street, due to an extreme change in topography. The unique circumstance of this lot disposes it to development of a building that is disproportionately disengaged from its actual street frontages. The Planning Department finds the proposed height, bulk, and massing substantially inconsistent with the policies of the Urban Design Element described above and with the intents of the zoning, including height and bulk limits, applicable to this site. A major redesign of the project is necessary to produce a project that is compatible with context and topography of the site, the neighborhood, and the general City pattern.

Scale, Bulk, and Massing

The site is zoned 40-X, intended for 4-story buildings. The project sponsor proposes to measure this height from the uppermost stub of 22nd Street where the extreme end of the lot extends, generating a 10-story building envelope that is over 500 feet in length, with no relation to the street grid or other element of the City fabric and with its full height and breadth apparent on the currently undeveloped east side of Potrero Hill. The resulting scale of the building substantially exceeds the intent of the height 40-foot height district and is fundamentally inconsistent with several key General Plan policies intended to protect the character of the City pattern.

Because of the large lot size, uniquely narrow and interior block configuration, and topography, the combined width and height of the building envelope proposed would result in a massive project that is out of scale with its context, is inconsistent with the City pattern, and would obscure key elements of Potrero Hill's topography and built fabric, including the proposed Potrero HopeSF development above the subject lot and the existing neighborhood at the bottom of the hill.

