

# SAN FRANCISCO PLANNING DEPARTMENT

MEMO

**DATE:** 

February 9, 2012

TO:

Drew Gordon, 275 Brannan LLC

FROM:

Julian Banales, Planning Department

RE:

PPA Case No. 2011.1410U

275 Brannan Street

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

Reception:

415.558.6378

Fax:

415.558.6409

Planning Information:

415.558.6377

Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Richard Sucre, at (415) 575-9108 or richard.sucre@sfgov.org, to answer any questions you may have, or to schedule a follow-up meeting.

Julian Banales, Senior Planner

## **Preliminary Project Assessment**

Suite 400 San Francisco, CA 94103-2479

Reception:

415.558.6378

1650 Mission St.

Fax:

415.558.6409

Planning Information: 415.558.6377

Date: February 9, 2012
Case No.: **2011.1410U**Project Address: 275 Brannan Street

*Block/Lot*: 3789/009

Zoning: MUO (Mixed Use Office) Zoning District

South End Historic District 65-X Height and Bulk District

Project Sponsor: Drew Gordon, Hudson 275 Brannan LLC

415-777-4100

Staff Contact: Rich Sucre [415-575-9108]

richard.sucre@sfgov.org

#### **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 located on corner lot (Assessor's Block 3789, Lot 009) at the southwest corner of Brannan and Colin P. Kelly Streets in the East SoMa neighborhood of the Eastern Neighborhoods Area Plan. The site is currently occupied by a three story, 52,411 square feet (sf) masonry building.

The proposal would renovate the existing three-story historic masonry and heavy timber building, and construct a new fourth floor addition (measuring approximately 13,389 sf) with an outdoor terrace. The proposed project would also add new building core on each floor with a new elevator, egress stairs, restrooms and lobbies. The first floor lobby would include bicycle storage and changing rooms with showers. New mechanical, automatic fire sprinkler system, plumbing and electrical systems would also be included.

### **ENVIRONMENTAL REVIEW:**

An **Environmental Evaluation Application** is required for the full scope of the project. 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 <a href="https://www.sfplanning.org">www.sfplanning.org</a>.

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. However, to the extent that new impacts and/or mitigation measures are identified which were not included in the Eastern Neighborhoods Area Rezoning and Area Plan Final EIR ("Eastern Neighborhoods FEIR"), and are peculiar to the project, the CPE would require an attached focused Initial Study/Negative Declaration, or an Environmental Impact Report (EIR) depending on whether or not the peculiar impacts can be fully mitigated. 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. This review may be done in conjunction with the required approvals listed below, but must be completed before any project approval may be granted:

Potential Archeological Mitigation: Archeological studies are generally not required unless the project includes grading or foundation work to a depth of five feet or more. If the site is found to be sensitive, less ground disturbance may trigger mitigation requirements prescribed in the Eastern Neighborhoods FEIR. The Eastern Neighborhoods FEIR was programmatic and did not analyze specific development projects in the project area; therefore, specific physical project evaluations would undergo individual environmental review in accord with Mitigation Measure J-2: Properties with No Previous Studies. Implementation of this prescribed mitigation measure would reduce the potential adverse effect on archeological resources of the project area to a less-than-significant level. Mitigation Measure J-2 applies to the entirety of the study area outside of Archeological Mitigation Zones A and B. Because the project site is outside Archeological Mitigation Zones A and B, 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. Noise: The project is not expected to result in any peculiar impacts not identified in the Eastern Neighborhoods FEIR, especially if Noise Mitigation Measures F-1, F-2 (Construction Noise) and F-5 (Siting of Noise-Generation Uses) are applied. Application of these mitigation measures would reduce any construction-related impacts to a less-than-significant level. Mitigation Measure F-1 (Construction Noise) applies to development projects within proximity to noise-sensitive uses that would include pile-driving. This mitigation measure requires: 1) individual project sponsors to take measures to reduce construction-related noise and vibration. Project sponsors shall ensure that piles be pre-drilled wherever feasible to reduce construction-related noise and vibration; 2) no impact pile drivers shall be used unless absolutely necessary; 3) contractors would be required to use piledriving equipment with state-of-the-art noise shielding and muffling devices; 4) the use of sonic or vibratory sheetpile drivers, rather than impact drivers, shall be used wherever sheetpiles are needed; and. 5) individual project sponsors shall also require that contractors schedule pile-driving activity for times of the day that would minimize disturbance to neighbors. Mitigation Measure F-2 (Construction Noise) applies to development projects where a determination has been made that construction noise controls are necessary due to the nature of planned construction practices and the sensitivity of proximate uses. If a determination is made, the Planning Director shall require that the sponsors of the subsequent development project develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Department of Building Inspection to ensure that maximum feasibility noise attenuation will be achieved. The Plan should include as many of the following control strategies as feasible: 1) erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses; 2) utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site; 3) evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses; 4) monitor the effectiveness of noise attenuation measures by taking noise measurements; and 5) post signs on-site pertaining to permitted construction days and hours and complaint procedures and who to notify in the event of a problem, with telephone numbers listed. Mitigation Measure F-5: Siting of Noise-Generating Uses applies for new developments including 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 proposed project site vicinity. To reduce potential conflicts between existing sensitive receptors and new noise-generating uses the proposed project sponsor is required to prepare an analysis that includes, at a minimum, a site survey to identify potential noise-sensitive uses within 900 feet of, and that have a 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), prior to the first project approval action. The analysis shall be prepared by persons qualified in acoustical analysis and /or engineering and shall demonstrate with reasonable certainty that the proposed use would comply with the use compatibility requirements in the general plan and Police Code 2909, would not adversely affect nearby noise-sensitive uses, and that there are no particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels that would be generated by the proposed use. Should concerns be present, the Department may require the completion of a detailed noise assessment by a qualified acoustical analyst or engineer prior to the first project approval action.

- Compliance with Bay Area Air Quality Management District Guidelines: Because the proposed project's construction activities require the use of heavy duty diesel equipment and emissions of diesel particulate matter is a known toxic air contaminate that may affect sensitive receptors (daycare facilities, schools, senior care facilities, hospitals, and dwelling units) located up to and perhaps beyond 300 feet from the project site, the project sponsor is required to retain a consultant with experience in air quality modeling to prepare an Air Quality Analysis Report. In consultation with the Department, the project sponsor's consultant shall prepare a detailed scope of work and submit it with the project's Environmental Evaluation Application for approval. During the environmental review process, an Air Quality Screening Analysis will be conducted for the proposed project. If the project has changed substantially than what is proposed in this PPA, the Air Quality Screening Analysis will document the appropriate level of air quality analysis that is needed. The results of the screening analysis will indicate whether additional air quality modeling would be required and if the proposed scope of work would have to be revised. It is important to note that the scope of work has to be approved prior to the commencement of any required analysis and/or modeling determined necessary. In the event that the Air Quality Analysis Report identifies new impacts and/or mitigation measures which were not included in the Eastern Neighborhoods Area Rezoning and Area Plans EIR, and are "peculiar" to the project, the CPE would require an attached Focused Initial Study and Negative Declaration, or a Focused EIR depending on whether or not the peculiar impacts can be fully mitigated.
- d. **Transportation Study:** A Transportation Study requirement is not anticipated. However, the project would eliminate at least one loading door/facility on Colin P. Kelley Junior Street. The project sponsor should work with the Department of Public Works and the Planning Department to remove the associated curb cut and enhance the surrounding streetscape.
- e. Phase I and Phase II Studies: Phase I and Phase II studies will likely be required by the Department of Public Health (DPH). Although not a CEQA issue, if required by DPH, a copy of the studies, if available, should be included with the Environmental Evaluation Application package. Please note that the studies must be completed before environmental clearance is issued. They should also be submitted to the Department as part of the project's administrative files. The project site is located within The Maher Area. The Maher Area encompasses the area of San Francisco bayward of a historic, pre-1906 Earthquake high tide line. This area of San Francisco was largely created by fill consisting primarily of debris associated with the 1906 Earthquake and Bay reclamation. The Maher Ordinance applies to that portion of the City bayward of the original high tide line, where past industrial uses and fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residue in soils and groundwater. The ordinance requires that soils must be analyzed for hazardous wastes if more than 50 cubic yards of soil are to be disturbed. The City adopted Ordinance 253-86 (signed by the Mayor on June 27, 1986), which requires analyzing soil for hazardous wastes within specified areas, known as the Maher area, when over 50 cubic yards of soil is to be disturbed and on sites specifically designated by the Director of Public Works.

The project is not expected to result in any peculiar impacts not identified in the Eastern Neighborhoods FEIR, especially if Hazardous Materials Mitigation Measure L-1 (Hazardous

Building Materials) is applied. Application of this mitigation measures would reduce any disposal of construction materials impacts to a less-than-significant level.

- f. **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.
- g. 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.

- h. **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.
- i. 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. Since the project's height is over 40 feet, a shadow fan analysis would be required. Based upon a preliminary analysis, the proposed project would not cast any shadow upon nearby public or private open space.
- j. **Historic Resource Evaluation Report (HRER):** Constructed in 1906, the subject building was originally known as the Rosenberg Brother's Warehouse. The building is a contributing resource to the locally-designated South End Historic District, which is also recognized as a historic district within the National Register of Historic Places. As such, the subject property would be considered a historic resource pursuant to California Environmental Quality Act (CEQA). To assist in the analysis

of the proposed project, which includes a fourth floor addition, the Planning Department requires a *Historic Resource Evaluation Report* to be prepared by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History. The qualified professional must be selected from one of three historic resource consultants assigned by the Planning Department during the submittal of the Environmental Evaluation Application.

Instructions on completing this report are included in "San Francisco Preservation Bulletin No. 16: City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources." The preservation bulletin is available at <a href="https://www.sfplanning.org">www.sfplanning.org</a> under: "Plans & Programs" "Historic Preservation" "Preservation Bulletins." Prior to initiating this report, please consult with Department Preservation Staff on the scope of work for this report.

k. 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 <a href="https://www.sfplanning.org">www.sfplanning.org</a>.

#### PLANNING DEPARTMENT APPROVALS:

The project requires the following Planning Department approvals. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

- 1. A **Certificate of Appropriateness** from the Historic Preservation Commission is required per Planning Code Section 1006. The Historic Preservation Commission will review and approve all exterior alterations to the subject property, which is a contributor to the South End Historic District.
- 2. An **Office Allocation** from the Planning Commission is required per Planning Code Section 321, since the project would seek to authorize more than 25,000 gross square feet of office space.
- 3. A **Building Permit Application** is required for the new fourth floor addition and change in use to office.

All applications are available in the lobby of Planning Department at 1650 Mission Street Suite 400; at the Planning Information Center at 1660 Mission Street; and online at <a href="www.sfplanning.org">www.sfplanning.org</a>. 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 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 packet, which includes instructions and template forms, is available at <a href="https://www.sfplanning.org">www.sfplanning.org</a>. All registered neighborhood group mailing lists may also be found at the Planning Department's website.

#### PRELIMINARY PROJECT COMMENTS:

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

- 1. **Eastern Neighborhoods: East SoMa Area Plan:** The proposed project is located within the boundaries of the East SoMa Area Plan of the Eastern Neighborhoods, and will be reviewed against the objectives and policies contained therein. Overall, the proposed project appears consistent with the objectives and policies of the East SoMa Area Plan.
- 2. Open Space: Planning Code Section 135.3 outlines an open space requirement for non-residential uses within Eastern Neighborhoods Mixed Use Zoning Districts for projects that add more than 20 percent gross floor area to an existing building. For office use, 1 sf of usable open space is required for 50 sf of occupied floor area of new, converted or added square footage. The project appears to meet the open space requirement with the new roof terrace. The project sponsor will need to provide the square footage of this roof terrace.
- 3. San Francisco Green Landscaping Ordinance: The proposed project is subject to the San Francisco Green Landscaping Ordinance, which assists in articulating Planning Code Sections 138.1. This code section outlines a provision for adding street trees when adding gross floor area equal to 20 percent or more of the gross floor area of an existing building. 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 six street trees would be required along Brannan Street and seven trees would be required along Colin P. Kelly Street. Existing trees on the project site would apply towards the street tree requirement. Please ensure that the proposed project is in compliance with this code section by providing an updated site plan showing landscaping and street trees.
- 4. **Street Frontage:** Planning Code Section 145.1 outlines requirements for street frontages to ensure that they are pedestrian-oriented, fine-grained, and are appropriate and compatible with the buildings. Please ensure that the ground floor street frontage meets these requirements as related to use, height, transparency, fenestration, gates, railings and grillwork. For historic buildings, specific street

frontage requirements may be modified or waived by the Planning Commission within designated historic districts when the Historic Preservation Commission advises that complying with specified street frontage requirements would adversely affect the historic character.

- 5. **Shadow:** Planning Code Section 147 states that a shadow analysis is required any project over 50 feet in height in the Eastern Neighborhoods Plan Area. Similarly, Planning Code Section 295 requires a shadow analysis be conducted for any project greater than 40 feet in height. The preliminary analysis for the proposed project indicates that it would not cast shadow on any nearby park. Therefore, further shadow analysis is not required.
- 6. Transportation Management Program: Planning Code Section 163 outlines requirements for an on-site transportation brokerage service for projects involving new, converted or added floor area of office use for properties within the MUO Zoning District with at least 25,000 sf. Prior to the Certificate of Occupancy, the Applicant must execute an agreement with the Planning Department for on-site transportation brokerage services and a transportation management program. This agreement will be approved by the Director of Planning.
- 7. Narrow Street Height Provisions: For projects within an Eastern Neighborhoods Mixed Use Zoning District along a Narrow Street (a public right of way less than or equal to 40 feet in width, or any mid-block passage or alley that is less than 40 feet in width), Planning Code Section 261.1 specifies that all subject frontages shall have upper stories set back at least 10 ft (feet) at the property line above a height equivalent to 1.25 times the width of the abutting narrow street. No part or feature of a building may penetrate the required setback plane. Along Colin P. Kelly Street, the proposed project has a projecting eave, which penetrates the 10 ft setback plane. Therefore, this aspect of the project needs to be revised to be compliant with this code section.
- 8. **Office Allocation:** The proposed project would need to obtain an Office Allocation from the Planning Commission, as outlined in Planning Code Section 321, and would be subject to EN Impacts Fees.
- 9. **Eastern Neighborhoods (EN) Impact Fees:** Planning Code Section 423 outlines the requirements for development impact fees for projects located within the Eastern Neighborhoods Area Plan. The proposed project is subject to Tier 2 EN Impact Fees. The proposed project includes an addition and a change in use to office. Based upon the proposed square footages, the EN Impact Fees would be calculated at \$7.43 per gross square foot for a change in use from PDR (Production Distribution and Repair) to non-residential space, and \$10.00 per gross square foot for newly constructed non-residential space (office). These fee amounts are subject to annual review by the City Controller, and may be subject to change.
- 10. **Certificate of Appropriateness:** Since the subject property is a contributor to the South End Historic District, which is a locally designated historic district listed in Article 10 of the San Francisco Planning Code, the proposed project is required to obtain a Certificate of Appropriateness (COA) from the Historic Preservation Commission (HPC) for any exterior alterations, including the façade improvements on Colin P. Kelly and Brannan Streets and the new one-story vertical addition.

The proposed addition will be reviewed against the following criteria, as determined by the HPC through the Certificate of Appropriateness process:

- a. **Signage-South End Historic District:** Section 6 of Appendix I of Article 10 of the San Francisco Planning Code outlines standards for signage within the South End Historic District. According to this code section, the permitted signage includes:
  - a) *Principal Signs*. Only one sign will be allowed per establishment per street frontage. A flush sign with lettering intended to be read from across the street is permitted. On brick surfaces, signs should be mounted with a minimum number of penetrations of the wall, and those penetrations only in the mortar joints.
  - b) Secondary Signs. One per establishment per street frontage. A secondary sign is intended to be viewed close-up and consists of: (a) Lettering on a door or window which contains only the name and nature of the establishment, hours of operation and other pertinent information. (b) A projecting sign not exceeding two square feet in area used in conjunction with a principal flush sign.

As currently proposed, the project shows a new two-story tall blade sign on the north façade. This sign would not be permitted per this code section. Please revise this aspect of the proposed project to meet this requirement.

- b. Additions-South End Historic District: Section 10 of Appendix I of Article 10 of the San Francisco Planning Code outlines standards for additions to contributing buildings within the South End Historic District. As noted within this code section:
  - i. Additions to existing buildings and new infill construction proposed within the South End Historic District must reflect an understanding of the relationship of the proposal with the contributing buildings within the district. Additions shall be reviewed for compatibility with the historic building... Neither should directly imitate nor replicate existing features. For additions, every effort should be made to minimize the visibility of the new structure within the district...
  - ii. Additions will be reviewed on a case-by-case basis and any proposed addition should be located in an inconspicuous location and not result in a radical change to the form or character of the historic building. A vertical addition may be approved, depending on how the addition impacts the building and its relative visibility from the surrounding public rights-of-way within the district. The Planning Department evaluates all proposals for properties identified under <a href="Article 10">Article 10</a> of the Planning Code for compliance with the Secretary of the Interior's Standards (36 C.F.R. § 67.7 (2001)). Based on these Standards, Department staff uses the following criteria when reviewing proposals for vertical additions:

The structure respects the general size, shape, and scale of the features associated with the property and the district and the structure is connected to the property in a manner that does not alter, change, obscure, damage, or destroy any of the character-defining features of the property and the district.

The design respects the general historic and architectural characteristics associated with the property and the district without replicating historic styles or elements that will result in creating a false sense of history.

The materials are compatible with the property or district in general character, color and texture.

As part of the Planning Department review process, the project sponsor shall conduct and submit an analysis that illustrates the relative visibility of a proposed vertical addition from within the district. As part of this analysis, sightline cross-sections and perspective drawings illustrating the proportionality and scale, as well as the visible extent of the addition from prescribed locations should be submitted.

- 11. **SFPUC Urban Watershed Management Program (UWMP):** Projects disturbing 5,000 sf or more of ground surface are subject to the Stormwater Management Ordinance and must meet the performance measures set within the *Stormwater Design Guidelines and Appendixes*. For more information, please refer to: <a href="http://www.sfwater.org/sdg">http://www.sfwater.org/sdg</a>. Please cite how the proposed project will meet this requirement.
- 12. **Recycled Water Ordinance:** For new construction of 40,000 sf or more or the addition of 10,000 sf or more of irrigated space, plumbing systems must recycled water. For more information, please contact the Department of Building Inspection.

To the extent possible, the project should be designed to minimize deviations from code requirements.

#### PRELIMINARY DESIGN COMMENTS:

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

- Ground Level Street Front: The proposed project should provide a streetscape plan, which will
  be required to illustrate proposed public realm improvements. The Department does not
  support the transformer in the location of the former loading bay/rail spur. Please locate the
  transformer in an underground vault. The new entrance systems appear to be asymmetrical in a
  building that has strong symmetrical patterns. Please revise the center entry door within new
  storefront system.
- 2. **Colin P. Kelly Jr. Street Façade Alterations:** Section 6 of Appendix I of Article 10 of the San Francisco Planning Code provides guidelines for façade alterations within the South End Historic District. Along Colin P. Kelly Jr. Street, the proposed project would relocate the building's transformer behind the existing loading dock bay, would remove the raised loading dock, and would replace the existing doors with new clerestory windows and doors at grade.

As currently designed, the façade alterations within the loading dock do not appear compatible with the historic building. Loading dock openings are characteristic of historic properties located within the South End Historic District. The clerestory windows should relate to the existing historic windows. Please relocate the transformer beneath the sidewalk, in order to maintain the raised loading dock. Façade alterations within this area should relate and be compatible with the building's pattern of openings and existing windows.

- 3. **New Addition:** The proposed addition should be designed to be more compatible with the existing historic building by designing the new addition to be subordinate and minimally visible from any public right of way.
  - a. Roof-New Addition: The thin roof overhang (projecting eaves) should not project significantly past the main façade and should be reduced in size, shape and thickness. As currently designed, the roof overhang visually competes with the strong corbelled and shaped parapet of the existing building. The undulating roof form should also be simplified.
  - b. **Glazing-New Addition:** The new addition's glazing bays and patterning should be simplified in operation and configuration, and be more regular in appearance using cues from the existing historic building. Please align the new windows to relate better to the building's solid to void ratio.
  - c. **Finishes-New Addition:** Please clarify the finish and materials of the exterior of the new addition, and provide justification for compatibility with the existing historic building.

#### 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 **August 9**, **2013**. 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

 Drew Gordon, Hudson 275 Brannan LLC, Project Sponsor Rich Sucre, Current Planning
 Monica Cristina Pereira, Environmental Planning
 David Winslow, Staff Architect