



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** March 31, 2016  
**TO:** Trish Beckman, Field Paoli Architects  
**FROM:** Jessica Range, Planning Department  
**RE:** PPA Case No. 2013.0152PPA for 2390 Bush Street/2445 Pine Street

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

Reception:  
**415.558.6378**

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**415.558.6409**

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Please find the attached Preliminary Project Assessment (PPA) for the address listed above. You may contact the staff contact, Rachel Schuett at (415) 575-9030 or [Rachel.Schuett@sfgov.org](mailto:Rachel.Schuett@sfgov.org), to answer any questions you may have, or to schedule a follow-up meeting.

  
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Jessica Range, Senior Planner





# SAN FRANCISCO PLANNING DEPARTMENT

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## Preliminary Project Assessment

*Date:* March 31, 2016  
*Case No.:* **2013.0152PPA**  
*Project Address:* 2390 Bush Street/2445 Pine Street  
*Block/Lot:* 0658 Lots 001 and 004  
*Zoning:* RH-3 (Residential House, Three Family)  
40-X Height and Bulk  
*Area Plan:* n/a  
*Project Sponsor:* Trish Beckman, Field Paoli Architects  
(415) 788-6606  
*Staff Contact:* Rachel Schuett – (415) 575-9030  
[Rachel.Schuett@sfgov.org](mailto:Rachel.Schuett@sfgov.org)

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### DISCLAIMERS:

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on November 25, 2015, as summarized below. This PPA letter identifies Planning Department review requirements for the proposed project, including those related to environmental review, approvals, neighborhood notification and public outreach, the Planning Code, project design, and other general issues of concern for the project. Please be advised that the PPA application does not constitute an application for development with the Planning Department. The PPA letter also does not represent a complete review of the proposed project, does not grant a project approval of any kind, and does not in any way supersede any required Planning Department approvals listed below.

The Planning Department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the Planning Department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Public Works, the Municipal Transportation Agency, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on the PPA application and plans, the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

### PROJECT DESCRIPTION:

The proposal is to demolish the existing 19,000-square-foot (sf) school building and construct a 3-story, pastoral center, and a 4-story, 50-foot-tall residential building. The pastoral center would serve community and parish activities with multi-meeting rooms, a childcare center, and various other support services.

The existing building on the 32,609-sf parcel (Lot 001) was constructed in 1929, it is a Category A building (known historic resource). The proposed new building would include 34,500 sf of community-serving uses. The proposed residential building would include up to 107 dwelling units of which 75 would be studio units and 35 would be 1-bedroom units. Up to 217 parking spaces would be provided, some surface parking and some in an underground parking garage. Vehicular access would be provided via new curb cuts on Steiner and Pierce Streets. A foundation design has not yet been recommended, but the underground parking garage would require excavation up to 18 feet below the ground surface. As currently proposed, the project is likely to be completed in two phases. Phase 1 would include construction of the pastoral center and Phase 2 would include construction of the residential building.

### **ENVIRONMENTAL REVIEW:**

The proposed project requires a project-specific environmental review. In compliance with the California Environmental Quality Act (CEQA), the environmental review process must be completed before any project approval may be granted. This review may be done in conjunction with the required approvals listed below. The formal environmental review process is initiated by submitting an **Environmental Evaluation Application (EEA)** for the full scope of the project. An EEA for the proposed project was received on February 4, 2013. A revised EEA should be submitted to reflect the current project description. **Note that until an entitlement application is submitted to the Current Planning Division, only the proposed Project Description will be reviewed by the assigned Environmental Coordinator.**

If it is determined that the project could result in a significant impact, an Environmental Impact Report (EIR) would be required. As discussed in the Historic Resources section below, staff identified the existing St. Dominic's School building as a historic resource and its demolition would result in a significant impact; thus an EIR would be required for the current project proposal. An EIR must be prepared by an environmental consultant from the Department's environmental consultant pool ([http://www.sfplanning.org/ftp/files/MEA/Environmental\\_consultant\\_pool.pdf](http://www.sfplanning.org/ftp/files/MEA/Environmental_consultant_pool.pdf)). Please contact Devyani Jain at (415) 575-9051 for a list of three eligible consultants.

A detailed and accurate description of the proposed project is essential for adequate environmental review. Please update the EEA project description as necessary to reflect feedback provided in this PPA letter, and include any additional documents requested herein.

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

1. **Historic Resources.** The project proposes to demolish St. Dominic's School building, a category 'A' (known historic resource) located at Lot 001 in Assessor's Block 0658. This would cause a significant adverse impact to the existing historic resource that cannot be fully mitigated. The environmental impact of demolition of the St. Dominic's School building will require preparation of an EIR. The EIR is required to identify alternatives to the project that would avoid or substantially lessen significant environmental effects; thus it is likely the EIR will need to analyze alternatives that seek to preserve the St. Dominic's School building. Additionally, the proposed replacement buildings would be constructed adjacent to, but detached from, the St. Dominic's Church building. Based upon previous

research and analysis developed in support of the St. Dominic's Church 1989 landmark nomination, the church building appears to be eligible for listing on the California Register as an individual historic resource under Criterion 3 (Architecture) as an outstanding example of Gothic Revival ecclesiastical architecture. As a result, the existing church building is considered an historic resource under CEQA. Therefore, as the proposed architectural design is refined, the design must be compatible with the scale, setting, and character of the historic church building so that it retains its visual prominence on the block. As currently proposed, the new buildings would not cause a significant adverse impact to the St. Dominic's Church building.

2. **Archeological Resources.** The proposed project will require Preliminary Archeological Review (PAR) by a Planning Department archeologist. To aid this review the Department archeologist may request a Preliminary Archeological Sensitivity Assessment (PASS) by a Department Qualified Archeological Consultant, subject to the review and approval by the Department archeologist. The Department archeologist will provide three names from the Qualified Archeological Consultant list if the PASS is required. The PAR will assess the archeological sensitivity of the project site based on in-house source material and will consider the potential for archeological impacts resulting from proposed soils disturbance. Please provide detailed information, including sections, proposed soils-disturbing activities, such as grading, excavation, installation of foundations, soils improvement, and site remediation in the EEA, and submit any available geotechnical/soils or phase II hazardous materials reports prepared for the project to assist in this review. If the Department archeologist determines that the project has a potential to adversely affect archeological resources, the PAR will identify additional measures needed to address the potential effect. These measures may include preparation of an archeological research design and treatment plan, implementation of one of the Planning Department's three standard archeological mitigation measures (archeological testing, monitoring, or accidental discovery), or other appropriate measures.
3. **Tribal Cultural Resources.** Tribal cultural resources (TCRs) are a class of resource established under the California Environmental Quality Act (CEQA) in 2015. TCRs are defined as a site, feature, place, cultural landscape, sacred place or object with cultural value to a California Native American tribe, that is either included on or eligible for inclusion in the California Register of Historical Resources or a local historic register, or is a resource that the lead agency, at its discretion and supported by substantial evidence, determines is a TCR. Planning Department staff will review the proposed project to determine if it may cause an adverse effect to a TCR; this will occur in tandem with preliminary archeological review. No additional information is needed from the project sponsor at this time. Consultation with California Native American tribes regarding TCRs may be required at the request of the tribes. If staff determines that the proposed project may have a potential significant adverse impact on a TCR, mitigation measures will be identified and required. Mitigation measures may include avoidance, protection, or preservation of the TCR and development of interpretation and public education and artistic programs.
4. **Transportation.** Based on the Planning Department's Transportation Impact Analysis Guidelines for Environmental Review,<sup>1</sup> the project would likely require some additional transportation analysis to determine whether the project may result in a significant impact. A final determination will be made

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<sup>1</sup> This document is available at: <http://www.sf-planning.org/index.aspx?page=1886>.

during the environmental review process. Additional information will be provided to you if it is determined that transportation analysis is required. Please note: additional fees for a transportation analysis is required and the analysis must be prepared by one of three consultants provided to you from the pre-qualified Transportation Consultant Pool (a list of consultants would be provided to you once a final transportation study determination is made).

Additionally, although the proposed project is not located on a high injury corridor as mapped by Vision Zero<sup>2</sup> the project sponsor is encouraged to include pedestrian and bicycle-friendly amenities and safety-related features some of which address the safety of persons walking and bicycling to and from the project site and vicinity such as visual/auditory warning devices at the project driveway. Once a more detailed site plan is submitted as part of the environmental review process, Planning Department staff will review proposed pedestrian and bicycle amenities and may provide additional site-specific recommendations.

5. **Noise.** Construction noise would be subject to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code), which includes restrictions on noise levels of construction equipment and hours of construction. If pile driving is to be used during the construction, measures to reduce construction noise may be required as part of the proposed project. The EEA application should indicate whether pile driving or other particularly noisy construction methods are required.

If the proposed project would generate noise that could result in a substantial permanent increase in ambient noise levels (e.g., as a result of events, from stationary equipment, etc.), the project may require a noise study. The noise study would include at a minimum: measurements of the existing noise environment, discussion of applicable noise regulations, analysis of the project's noise effects and the ability of noise sources to meet applicable noise standards. The noise analysis shall be conducted by a qualified noise consultant who shall prepare a noise study scope of work for approval by the assigned environmental coordinator prior to conducting any noise study.

6. **Air Quality.** The proposed project at 107 dwelling units and 34,500 sf of community services is below the Bay Area Air Quality Management District's (BAAQMD) construction and operational screening levels for criteria air pollutants.<sup>3</sup> Therefore, an analysis of the project's criteria air pollutant emissions is not likely to be required. However, if the project includes a substantial amount of excavation (i.e., for the proposed below grade parking facility), it would then not meet the construction criteria air pollutant screening levels and quantitative analysis would be required. Please provide detailed information related to construction equipment, phasing and duration of each phase, and the volume of excavation.

Project-related demolition, excavation, grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. To reduce construction dust impacts, the proposed project will be required to adhere to the dust control requirements set

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<sup>2</sup> This document is available at: <http://www.sfmta.com/sites/default/files/projects/2015/vision-zero-san-francisco.pdf>.

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

forth in the Construction Dust Ordinance contained in San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6. The proposed project is also required to prepare a Construction Dust Control Plan for review and approval by DPH.

The proposed project includes residential units and is therefore a sensitive receptor; however, the project site is not located within an Air Pollutant Exposure Zone (as defined and mapped in Health Code, Article 38).

The proposed project may include a backup diesel generator. If the project would generate new sources of toxic air contaminants including, but not limited to: diesel generators or boilers, or any other stationary sources, the project would result in toxic air contaminants that may affect both on-site and off-site sensitive receptors. Additional mitigation measures, will likely be necessary to reduce its emissions. Please provide detailed information related to any proposed stationary sources as part of the environmental scoping process.

7. **Greenhouse Gases.** *The City and County of San Francisco's Strategies to Address Greenhouse Gas Emissions* presents a comprehensive assessment of policies, programs, and ordinances that represents San Francisco's Qualified Greenhouse Gas (GHG) Reduction Strategy. Projects that are consistent with San Francisco's Qualified GHG Reduction Strategy would result in less-than-significant impacts from GHG emissions. In order to facilitate a determination of compliance with San Francisco's Qualified GHG Reduction Strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist.<sup>4</sup> The project sponsor is required to submit the completed table regarding project compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco's Greenhouse Gas Reduction Strategy. Projects that do not comply with an ordinance or regulation may be determined to be inconsistent with the Greenhouse Gas Reduction Strategy.
8. **Wind.** The proposed project would not involve the construction of a building over 80 feet in height. Therefore, a wind analysis is not required.
9. **Shadow.** As currently proposed the project would result in the construction of a building greater than 40 feet in height. Dimensioned elevations have not been provided for both buildings; once this information is provided, a preliminary shadow fan analysis will be prepared by Planning Department staff to see whether or not the proposed project buildings could cast shadows on any recreational resources. If net new shadow could be cast onto a recreational resource, the project sponsor would be required to hire a qualified consultant to prepare a detailed shadow study. The consultant must submit a Shadow Study Application, which can be found on the Planning Department's website (<http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=539>). A separate fee is required. The consultant must also prepare a proposed scope of work for review and approval by Environmental Planning staff prior to preparing the analysis.

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<sup>4</sup> Refer to <http://sf-planning.org/index.aspx?page=1886> for latest "Greenhouse Gas Compliance Checklist for Private Development Projects."

10. **Geology.** A final geotechnical study prepared by a qualified consultant must be submitted during the environmental review process. The study should address whether the site is subject to liquefaction, and should provide recommendations for any geotechnical concerns identified in the study. In general, compliance with the building codes would avoid the potential for significant impacts related to structural damage, ground subsidence, liquefaction, landslides, and surface settlement. To assist Planning Department staff in determining whether the project would result in environmental impacts related to geological hazards, it is recommended that you provide a copy of the geotechnical information with boring logs for the proposed project. This study will also help inform the Planning Department Archeologist of the project site's subsurface geological conditions. The geotechnical analysis should also include a foundation recommendation, which informs the archeological review and assessment of construction-related air quality impacts.
11. **Hazardous Materials.** The proposed project would not be subject to Article 22A of the Health Code, also known as the Maher Ordinance based on the project site location, but would be subject to the Maher Ordinance based on the fact that the project would involve more than 50 cubic yards (cy) of excavation. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I ESA would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

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

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

12. **Naturally Occurring Asbestos.** The proposed project would not include excavation on a site that is underlain by serpentine soils. Therefore, there are no project-related concerns related to naturally occurring asbestos.
13. **Disclosure Report for Developers of Major City Projects.** The San Francisco Ethics Commission S.F. Camp. & Govt. Conduct Code § 3.520 et seq. requires developers to provide the public with information about donations that developers make to nonprofit organizations that may communicate with the City and County regarding major development projects. This report must be completed and



filed by the developer of any "major project." A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding \$1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a Community Plan Exemption (CPE); certification of an EIR; adoption of a Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. (In instances where more than one of the preceding determinations occur, the filing requirement shall be triggered by the earliest such determination.) A major project does not include a residential development project with four or fewer dwelling units. The first (or initial) report must be filed within 30 days of the date the Planning Commission (or any other local lead agency) certifies the EIR for that project or, for a major project relying on a program EIR, within 30 days of the date that the Planning Department, Planning Commission, or any other local lead agency adopts a final environmental determination under CEQA. Please submit a Disclosure Report for Developers of Major City Projects to the San Francisco Ethics Commission. This form can be found at the Planning Department or online at <http://www.sfethics.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. **Conditional Use Authorization** from the Planning Commission is required per Planning Code Section 209.1 for the expansion of an existing religious institution in an RH district and for child care facilities involving 15 or more children, and Section 304 for Planned Unit Developments on lots not less than ½ acre in size and to provide for modifications of certain provisions contained elsewhere in the Code.
2. A **Lot Line Adjustment Application** is required from Public Works for adjusting property lines.
3. A **Building Permit Application** is required for the demolition of the existing building on the subject property.
4. A **Building Permit Application** is required for the proposed new construction on the subject property.

Conditional Use Authorization applications are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at [www.sfplanning.org](http://www.sfplanning.org). Building Permit applications are available at the Department of Building Inspection at 1660 Mission Street. Lot Line Adjustment applications are available at Public Works at 1155 Market Street, and online at [www.sfdpw.org](http://www.sfdpw.org).

**NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:**

Project Sponsors are encouraged, and in some cases required, to conduct public outreach with the surrounding community and neighborhood groups early in the development process. Additionally, many approvals require a public hearing with an associated neighborhood notification. Differing levels of neighborhood notification are mandatory for some or all of the reviews and approvals listed above.

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 [www.sfplanning.org](http://www.sfplanning.org) under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at [www.sfplanning.org](http://www.sfplanning.org) under the "Resource Center" tab.

**Notification of a Project Receiving Environmental Review.** Notice is required to be sent to occupants of the project site and properties adjacent to the project site, as well as to owners and, to the extent feasible, occupants of properties within 300 feet of the project site at the initiation of the environmental review process. Please be prepared to provide mailing addresses on a CD upon request during the environmental review process.

**PRELIMINARY PROJECT COMMENTS:**

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

1. **Development Lot.** As proposed, the scope of development includes Lots 002, 002A, 003 and 004 in Assessor's Block 0658 and treats the combined properties as a single development lot with a cumulative area of 113,424 square feet. As a single development lot greater than .5-acre, the project may proceed as a Planned Unit Development (PUD) per Planning Code Section 304 and seek exceptions from the Planning Code through that process, rather than as Variances.
2. **Planned Unit Development.** Planning Code Section 304 outlines the procedures for Planned Unit Developments which are intended for projects on sites of considerable size, developed as integrated units and designed to produce an environment of stable and desirable character which will benefit the occupants, the neighborhood and the City as a whole. In cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well-reasoned modification of certain provisions contained elsewhere in the Planning Code. The proposed development must meet the criteria applicable to Conditional Uses as stated in Section 303(c) and in addition, it shall affirmatively promote applicable objectives and policies of the General Plan including, but not limited to, principles of good urban design.
3. **Rear Yard.** Section 134 requires the project to provide a rear yard of at least 45 percent of the lot depth. Because both Phases 1 and 2 of this project are proposed for corner sites, one of the street frontages must be designated as the front of the property, and the rear yard would then be provided based on that determination. The "interior corner" configuration proposed for the rear yards is not permitted in the RH-3 District, but may be modified through the Planned Unit Development process. While such configurations can be supported, subject to other design criteria, a minimum of 25 percent

of the lot area is preferred. The plans submitted do not provide proposed dimensions for the rear yard areas.

4. **Obstructions Over Streets and Into Yards.** Section 136(c)(2)(D) of the Planning Code allows projecting bay windows to be a maximum length of 15 feet at the line establishing the required open area, and then reduced in proportion to the distance from such line by means of 45 degree angles drawn inward from the ends of such 15-foot dimension, reaching a maximum of nine feet along a line parallel to and at a distance of three feet from the line establishing the required open area. Several bay windows in the residential building (Phase 2) are proposed to project above the Pine Street and Pierce Street rights-of-way, however no dimensions have been provided.
5. **Standards for Bird Safe Buildings.** Planning Code Section 139(c)(2) applies to unbroken glazed segments 24 square-feet in area, or larger. Please calculate the area of unbroken glazed segments and provide the appropriate notations on the elevations. Please refer to the published document *Standards for Bird-Safe Building*, available online at [www.sf-planning.org](http://www.sf-planning.org).
6. **Exposure.** Section 140 requires that each dwelling unit have at least one room that meets the 120-square-foot minimum superficial floor area requirement of Section 503 of the Housing Code face directly on a street right-of-way, code-complying rear yard, or an appropriately sized courtyard. It is not possible to determine whether the proposed rear yard is code-complying and whether it is large enough to meet the exposure requirement for those units that only have windows facing the rear yard area. Therefore, the proposed project may require revisions to meet the minimum exposure requirement, or you may request and justify an exposure exception through the Planned Unit Development process. The Department generally encourages projects to minimize the number of units needing an exposure exception.
7. **Open Space.** Section 135 of the Planning Code requires 100 square feet of private open space per unit or 133 square feet of common open space per unit. Any space credited as common usable open space shall be at least 15 feet in every horizontal dimension and shall have a minimum area of 300 square feet. For the 107 dwelling units proposed, a total of 14,231 square feet of common usable open space would be required. No private or common open space has been shown on the proposed plans. Please revise the plans to show code-complying open space areas. Alternatively, a modification to the open space requirements through the Planned Unit Development process must be sought and justified.
8. **Streetscape Plan.** The project is on a lot that is greater than one-half acre in total area, contains 250 feet of total lot frontage on one or more publicly-accessible rights-of-way, encompasses the entire block face between the nearest two intersections, and proposes new construction, 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.

9. **Street Frontages in RH Districts.** Planning Code Section 144(b)(2) requires no less than one-third of the width of the ground story along the front lot line, along a street side lot line, and along a building wall that is set back from any such lot line, to be devoted to windows, entrances for dwelling units, landscaping, and other architectural features that provide visual relief and interest for the street frontage. Please provide the dimensions of the proposed driveways, garage entrances, windows, landscaping and other architectural features on the appropriate plans.
10. **Vehicular Parking.** Planning Code Section 151.1 requires the residential (Phase 2) portion of the project to provide at least 107 off-street vehicular parking spaces. The child care facility proposed in Phase 1 would require up to 1 off-street parking space for each 25 children to be accommodated at any one time. The projected occupancy of the child care facility has not been provided. In order to determine the amount of parking required for the proposed pastoral center, more information is needed regarding the programming of these spaces, as the parking rate may vary depending on the types of uses proposed. As the existing church building and priory building do not appear to have their own separate parking areas, it is assumed that the proposed 217 below-grade, off-street vehicular parking spaces would serve these buildings as well as the proposed new uses in Phases 1 and 2. Please also provide more information (dwelling units, floor areas, number of seats, etc.) for these existing buildings. Any deficiency of off-street spaces may be modified through the Planned Unit Development approval process per Planning Code Section 304 or can be replaced by bicycle parking spaces per Section 150(e) of the Planning Code.
11. **Bicycle Parking.** Planning Code Section 155.2 requires this project to provide secure, weather-protected Class 1 bicycle parking facilities intended for use as long-term, overnight, and work-day bicycle storage by non-residential occupants, and employees as well as publicly-accessible Class 2 bicycle parking spaces in a highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use. No bicycle parking spaces have been shown on the plans. Please provide the number of existing, required and proposed bicycle spaces based on the occupied floor area of the uses listed in Table 155.2 and indicate the location and dimensions of all bicycle parking spaces on the existing and proposed site plan and floor plan drawings.
12. **Car sharing.** Planning Code Section 166 requires this project to provide at least one car share space. The proposed project contains no car share spaces.
13. **Baby Diaper-Changing Accommodations.** Planning Code Section 168 requires that a substantially renovated Institutional use that is 5,000 square feet or more in size provide a safe, sanitary and convenient baby diaper-changing station, deck table or similar amenity that is installed or placed in a separate, designated location. Each New Public-Serving Establishment or Substantially Renovated Public-Serving Establishment shall be required to install and maintain, at each floor level containing restrooms accessible to the public, at least one Baby Diaper-Changing Accommodation that is accessible to women and one that is accessible to men, or a single Diaper-Changing Accommodation that is accessible to both. Each Establishment shall provide signage at or near its entrance indicating the location of the Baby Diaper-Changing Accommodations. Any New Public-Serving Establishment

or Substantially Renovated Public-Serving Establishment encompassing multiple establishments and having a central directory shall indicate on the directory the location of all such accommodations.

14. **Dwelling Unit Density.** Section 209.1 of the Planning Code permits a maximum density of 3 dwelling units per lot. Section 304(d)(4) of the Planning Code permits a dwelling unit density less than the density that would be allowed for a district permitting a greater density, so that the Planned Unit Development will not be substantially equivalent to a reclassification of property. After the RH-3 district, the next more intense district in Article 2 of the Planning Code is the RM-1 district, which permits up to one unit per 800 square feet of lot area. Therefore, the Planned Unit Development process would allow for a residential density of one unit less than 1 unit per 800 square feet of lot area. In this instance, with a total lot area of 113,424 square feet, a total of 141 dwelling units could be permitted.
15. **Floor Area Ratio.** Planning Code Section 209.1 permits a maximum non-residential floor area ratio of 1.8 to 1. The entire site would allow for non-residential uses totaling 204,163 square feet. The application indicates that the pastoral center (Phase 1) would have a gross floor area of 34,500 square feet, however no existing gross floor area calculations have been provided for other non-residential uses on the site.
16. **Child Care Facility.** Planning Code Section 209.1 permits child care facilities in the RH-3 district; however Conditional Use Authorization is required for such uses involving 15 or more children.
17. **Building Height.** The subject property is in a 40-X Height and Bulk District. The maximum permitted building height is 40 feet. The east elevation indicates that the proposed pastoral center and child care facility building will be 39 feet in height. No elevations with height dimensions have been provided for the proposed residential building (Phase 2).
18. **First Source Hiring Agreement.** A First Source Hiring Agreement is required for any project proposing to construct 25,000 gross square feet or more. For more information, please contact:

Ken Nim, Workforce Compliance Officer  
CityBuild, Office of Economic and Workforce Development  
City and County of San Francisco  
50 Van Ness Avenue, San Francisco, CA 94102  
(415) 581-2303

19. **Inclusionary Affordable Housing.** Inclusionary Affordable Housing is required for a project proposing ten 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 affordable housing fee. Any on-site affordable dwelling-units proposed as part of the project must be designated as owner-occupied units, not rental units; unless a Costa Hawkins agreement is possible. 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 minimum Affordable Housing Percentages are 20% affordable housing fee,

12% on-site, or 20% off-site. Therefore, as proposed, the project would have a minimum requirement of 13 units if provided on-site, and 21 units if provided off-site.

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:

- o direct financial construction from a public entity
- o 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 the Director of Current Planning. If the project is deemed eligible, we may start working with the City Attorney on the agreement.

20. **Stormwater.** If the project results in a ground surface disturbance of 5,000 sf or greater, it is subject to San Francisco's stormwater management requirements as outlined in the Stormwater Management Ordinance and the corresponding SFPUC Stormwater Design Guidelines (Guidelines). Projects that trigger the stormwater management requirements must prepare a Stormwater Control Plan demonstrating project adherence to the performance measures outlined in the Guidelines including: (a) reduction in *total volume* and *peak flow rate* of stormwater for areas in combined sewer systems OR (b) *stormwater treatment* for areas in separate sewer systems. The SFPUC Wastewater Enterprise, Urban Watershed Management Program is responsible for review and approval of the Stormwater Control Plan. Without SFPUC approval of a Stormwater Control Plan, no site or building permits can be issued. The Guidelines also require a signed maintenance agreement to ensure proper care of the necessary stormwater controls. To view the Stormwater Management Ordinance, the Stormwater Design Guidelines, or download instructions for the Stormwater Control Plan, go to <http://sfwater.org/sdg>. Applicants may contact [stormwaterreview@sfwater.org](mailto:stormwaterreview@sfwater.org) for assistance.
21. **Impact Fees.** This project will be subject to various impact fees. Please refer to the Planning Director's Bulletin No. 1 for an overview of Development Impact Fees, and to the Department of Building Inspection's Development Impact Fee webpage for more information about current rates.

Based on an initial review of the proposed project, the following impact fees, which are assessed by the Planning Department, will be required:

- a. Transportation Sustainability Fee (TSF)
- b. Child-Care (414)

**PRELIMINARY DESIGN COMMENTS:**

The following comments address preliminary design issues that may substantially affect the proposed project:

The project site is located in the Western Addition neighborhood. The project site contains an existing structure considered to be a known historic resource; therefore, the proposed project is subject to further design review by the Department's Historic Preservation staff. Please refer to the Environmental Planning Review – Historic Resources section of the Preliminary Project Assessment for further instruction.

**1. Site Design.** The building at 2390 Bush is classified as a category 'A' historic resource. The Planning Department recommends the project sponsor retain the existing building and find a suitable adaptive-reuse solution that provides an expansion with high-quality materials compatible with the context and meets the scale, urban pattern, and architectural character of the neighborhood. Should the adaptive reuse of the existing resource and the program of the new use prove to be infeasible, the Department strongly urges project sponsor to explore siting a new building on the Pierce frontage where there is ample site area to accommodate such a building.

**2. Vehicle Circulation, Access and Parking.** The Planning Department recommends careful consideration of the location all garage access points. The Planning Department recommends the parking access be re-located away from the corner of Steiner and Bush, and a more active function be provided at that corner. While removing existing at-grade parking is laudable, the Department recommends minimizing the size of vehicular and loading access points. Abandon unused curb cuts or driveways.

Bike parking should be as close as possible to lobbies or garage entrances to minimize the travel distance through the garage and conflict with automobiles.

**3. Architecture.** The Planning Department recommends the residential portion of the project take cues from the pattern of the block on the other side of the street. The Planning Department recommends the residential portion of the project provide a landscaped setback comprised of raised individual stoops that allow direct access to ground floor dwellings. These should provide a usable transition space between the sidewalk and the dwellings per the Draft Ground Floor Residential Design Guidelines.

As the plans are currently diagrammatic, the Planning Department has little comment on the architecture at this time.

**4. Required Streetscape and Pedestrian Improvements.** Per Planning Code Section 138.1, the project sponsor will be required to submit a Streetscape Plan illustrating the location and design of streetscape improvements appropriate to the street type, including site furnishings, landscaping, corner curb extensions, and sidewalk widening as appropriate. The Planning Department may require these elements as part of conditions of approval. See <http://www.sfbetterstreets.org/design-guidelines/street->

types/ to identify relevant street types for the project frontage. The Planning Department recommends that the sponsor consider public realm features, such as corner bulb-outs. Planning staff is happy to review proposals or meet with the project sponsor to explore ideas.

For more information on process, guidelines, and requirements for street improvements, refer to [www.sfbetterstreets.org](http://www.sfbetterstreets.org).

Required streetscape and pedestrian improvements are not eligible for in-kind fee credit.

**PRELIMINARY PROJECT ASSESSMENT EXPIRATION:**

This Preliminary Project Assessment is valid for a period of **18 months**. However, an Environmental Evaluation Application (EEA) has already been submitted. Thus, this determination is considered valid, and will not expire so long as future applications and plans are generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Neighborhood Group Mailing List

cc: Michael Rossi, Property Owner  
Christopher May, Current Planning  
Rachel A. Schuett, Environmental Planning  
Scott Edmondson, Citywide Planning and Analysis  
Jonas Ionin, Planning Commission Secretary  
Charles Rivasplata, SFMTA  
Jerry Sanguinetti, Public Works  
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