



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Project Assessment

Date: September 16, 2013
Case No.: **2013.0975U**
Project Address: 888 Tennessee Street
Block/Lot: 4060/001
Zoning: UMU (Urban Mixed-Use) Zoning District
Dogpatch Landmark District
45-X Height and Bulk District
Area Plan: Eastern Neighborhoods
Project Sponsor: Andrew Junius, Reuben, Junius & Rose LLP
ajunius@reubenlaw.com
Staff Contact: Amnon Ben-Pazi – 415.575.9077
Amnon.ben-Pazi@sfgov.org

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DISCLAIMERS:

Please be advised that this determination does not constitute an application for development with the Planning Department. It also does not represent a complete review of the proposed project, a project approval of any kind, or in any way supersede any required Planning Department approvals listed below. The Planning Department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the Planning Department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Department of Public Works, Department of Public Health, and others. The information included herein is based on plans and information provided for this assessment and the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

PROJECT DESCRIPTION:

The proposal includes demolition of the existing two-story building (approximately 42,720 sq ft), and construction of a new four-story-over-basement mixed-use building (approximately 127,779 sq ft). The new building would include: 110 dwelling units, composed of 46 two-bedroom units, 31 one-bedroom units, 16 junior one-bedroom units and 17 studio units; a landscaped courtyard; approximately 2,155 sq ft of commercial space; and approximately 94 off-street parking spaces, which would be located within a below-grade garage.

ENVIRONMENTAL REVIEW:

An Environmental Evaluation Application (EEA) is required for the full scope of the project. The Environmental Evaluation Application is available in the San Francisco (Planning Department) lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, or online at www.sfplanning.org under the "Permits & Zoning" "Permit Forms." To determine fees for environmental

review, please refer to page one of our fee schedule, under “Studies for Projects inside of Adopted Plan Areas.”

The project site is located within the Central Waterfront area in the Eastern Neighborhoods Area Plan, which was evaluated in *Eastern Neighborhoods Rezoning and Area Plans Final Environmental Impact Report EIR* (Eastern Neighborhoods FEIR) certified in 2008.¹

Section 15183 of the California Environmental Quality Act (CEQA) Guidelines states that projects that are consistent with the development density established by a community plan for which an environmental impact report (EIR) was certified do not require additional environmental review, except as necessary to determine the presence of project-specific significant effects not identified in the programmatic plan area EIR. As the proposed project is consistent with the development density identified in the area plan, it is eligible for a Community Plan Exemption (CPE). With the CPE process, there are three different potential outcomes:

1. **CPE Only.** If potentially significant project-specific and cumulatively considerable environmental impacts of the proposed project are fully consistent with significant impacts identified in the Eastern Neighborhoods FEIR, and there would be no new "peculiar" significant impacts unique to the proposed project, a CPE checklist and certificate is prepared. All pertinent mitigation measures and California Environmental Quality Act (CEQA) findings from the Eastern Neighborhoods FEIR are applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the CPE certificate fee (currently \$7,402); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for the Eastern Neighborhoods FEIR.
2. **CPE + Focused Initial Study/Mitigated Negative Declaration.** If new "peculiar" significant impacts are identified for the proposed project that were not identified in the Eastern Neighborhoods FEIR, and if all of these new significant impacts "peculiar" to the proposed project can be mitigated to a less-than-significant level, then a focused Mitigated Negative Declaration to address these impacts is prepared and a supporting CPE certificate is prepared to address all other impacts that were encompassed by the Eastern Neighborhoods FEIR, with all pertinent mitigation measures and CEQA findings from the Eastern Neighborhoods FEIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); and (c) a proportionate share fee for recovery for costs incurred by the Planning Department for the Eastern Neighborhoods FEIR.
3. **CPE + Focused EIR.** If the proposed project would result in new “peculiar” significant impacts and if any of these new "peculiar" significant impacts cannot be mitigated to a less-than-significant level, then a focused EIR to address these impacts is prepared and a supporting CPE certificate is prepared to address all other impacts that were encompassed by the Eastern Neighborhoods FEIR, with all pertinent mitigation measures and CEQA findings from the Eastern Neighborhoods FEIR also applied to the proposed project. With this outcome, the applicable fees are: (a) the CPE determination

¹ Available for review on the Planning Department’s Area Plan EIRs web page: <http://www.sf-planning.org/index.aspx?page=1893>.

fee (currently \$13,339); (b) the standard environmental evaluation fee (which is based on construction value); (c) one-half of the standard EIR fee (which is also based on construction value); and (d) a proportionate share fee for recovery for costs incurred by the Planning Department for the Eastern Neighborhoods FEIR.

Below is a list of studies that would be required based on preliminary review of the project in the Preliminary Project Assessment (PPA) submittal dated July 18, 2013.

- a. **Land Use and Land Use Planning.** The proposed project includes the demolition of the existing 38,520-square-foot concrete warehouse structure on the project site that contains building area occupied by PDR (Production, Distribution, and Repair) land uses. Analysis in the Eastern Neighborhoods FEIR supported the finding that implementation of the Eastern Neighborhoods Rezoning and Area Plan would result in a significant and unavoidable cumulative impact to the supply of land available for PDR uses in the Plan Area. The Planning Department will determine whether the proposed project would result in a cumulatively considerable contribution to the loss of PDR in the Eastern Neighborhoods. The Eastern Neighborhoods FEIR did identify a mitigation measure, **Mitigation Measure A-1: Western SoMa Rezoning**, that would lessen the impact but was found to be infeasible. This mitigation measure includes language urging the Planning Commission and Board of Supervisors to ensure that the community planning process in the Western SoMa Area Plan place a priority on the maintenance of land use to controls to accommodate PDR uses and restrict potentially incompatible uses, such as residential and office development, to minimize conflicts with existing and potential future PDR businesses. The final environmental impact report for the Western SoMa Area Plan² included analysis showing that the Western SoMa Area Plan would allow for the retention of a similar number of PDR jobs throughout implementation of that Plan (2030).
- b. **Historic Architectural Resources.** Currently, 888 Tennessee Street is a two-story reinforced-concrete light industrial building constructed in 1953. The existing building is a non-contributing resource located within the Dogpatch Landmark District, which is locally-designated in Article 10 of the San Francisco Planning Code. Therefore, the project site is located within boundaries of a designated historic resource, as defined by CEQA.

The Eastern Neighborhoods FEIR found that the proposed Area Plan rezoning to change the height and land use designations of properties would potentially result in a loss of known and potential historic resources. The FEIR identified up 28 known historic resources and 34 potential historic resources that could be adversely impacted or lost as a result of the rezoning. The project site was identified as one of the known historic resources that could potentially be altered or demolished. The FEIR identified the potential impact of the loss of these historic resources as a significant and unavoidable impact. **Mitigation Measure K-1: Interim Procedures for Permit Review in the Eastern Neighborhoods Plan Area** was adopted establishing a set of interim building permit review policies developed to provide temporary protection for potential historic resources within the Eastern Neighborhoods Plan Area until a historic resource survey could be completed for the Plan Area. The mitigation measure includes language stipulating that upon completion of the survey and amendment

² Available for review on the Planning Department's Area Plan EIRs web page at <http://www.sf-planning.org/modules/showdocument.aspx?documentid=9034>.

of the Plan to include the results, the building permit review procedures in the mitigation measure would expire. The historic resource survey has been completed and its results incorporated into the Plan. Therefore, Mitigation Measure K-1 is no longer applicable. **Mitigation Measure K-2: Amendments to Article 10 of the Planning Code Pertaining to Vertical Additions in the South End Historic District (East SoMa)** is not applicable as the project site is not within the South End Historic District. The third historic resource mitigation measure, **Mitigation Measure K-3: Amendments to Article 10 of the Planning Code Pertaining to Alterations and Infill Development in the Dogpatch Historic District (Central Waterfront)**, contains provisions regulating the design of alterations to contributory structures within the Dogpatch Historic District. The structure on the project site at 888 Tennessee was determined to not be a contributory building in the Dogpatch Historic District subsequent to adoption of the Plan based on the results of the historic resource study prepared for the Plan Area. Therefore, **Mitigation Measure K-3** does not apply to the proposed project.

To assess impacts upon the surrounding landmark and ensure compatibility with the adjacent historic resources, the Project Sponsor must provide a Historic Resource Evaluation (HRE) completed by a qualified professional who meets the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History. This HRE should focus on the compatibility of the new construction with the surrounding historic district, as defined by the Secretary of the Interior's Standards for Rehabilitation and Article 10 of the San Francisco Planning Code. The qualified professional must be selected from the City's approved list of Historic Resource Consultants.³ After submittal of the environmental evaluation application, please contact Tina Tam, Senior Preservation Planner at the Planning Department at (415) 558-6325 or tina.tam@sfgov.org for a list of three consultants. Prior to undertaking any work on this report, please ensure that the selected consultant seeks approval on the scope of work for the Historic Resource Evaluation from Planning Department Preservation staff.

- c. **Archaeological Resources.** No previous archeological survey has been prepared for the project site. Excavation for the project is anticipated to be 11 feet below the existing grade. If the area is found to be sensitive for archeological resources, even a small amount of ground disturbance may trigger mitigation requirements. The Eastern Neighborhoods FEIR was programmatic and did not analyze specific development projects in the Plan Area; therefore, specific physical project evaluations, such as 888 Tennessee Street, must undergo individual review in accordance with **Mitigation Measure J-2: Properties with No Previous Studies** from the Eastern Neighborhoods FEIR. Implementation of this prescribed mitigation measure would reduce the potential significant adverse impacts on archeological resources of the project area to a less-than-significant level.

Mitigation Measure J-2 – Properties with No Previous Studies. 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 archeological consultant has to be selected from the Planning

³ San Francisco Planning Department Historic Resource Consultant Pool is available online at http://www.sf-planning.org/ftp/files/MEA/Historic_Resources_consultant_pool.pdf. Accessed September 5, 2013.

Department's Archeological Review Consultant Pool⁴ and in accordance with the Planning Department's consultant selection procedure. 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 CRHR-eligible archeological resources could be adversely affected by the proposed project and recommend appropriate further action.

- c. **Transportation.** The proposed building would include 2,155 square feet of retail space and 110 dwelling units (totaling 88,845 square feet in size), consisting of 46 two-bedroom units, 47 one-bedroom units and 17 studio units. Based on the Planning Department's Transportation Impact Analysis Guidelines, the proposed project would generate approximately 1,263 daily persons-trips and 192 P.M. peak-hour persons-trips.⁵ Based on this projection, a Transportation Impact Study (TIS) would most likely be required to be prepared for the proposed project. A formal determination as to whether a TIS is required will be made after submittal of the EEA. If a TIS is required, the consultant must be selected from one of three transportation consultants from the Planning Department's Transportation Consultant Pool⁶ assigned to this project by the Planning Department during the environmental review process.

The conceptual site plan and building cross-section submitted with the PPA do not provide enough information for Environmental Planning staff to be able to review the on-site circulation and facilities. The plans submitted with the EEA should include existing and proposed site plans showing all on-site parking and loading areas; vehicular, bicycle, and garbage truck access areas; planned streetscape improvements; and existing and proposed curb cuts. Additionally, the planned sidewalk and right-of-way improvements shall adhere to the Better Streets Plan.

- d. **Hazardous Materials.** The existing industrial structure that would be removed may contain building materials with hazardous materials that could be released during the demolition process. In order to eliminate this potential significant impact, the Eastern Neighborhoods FEIR included the following mitigation measure that would need to be implemented as part of the project:

Mitigation Measure L-1—Hazardous Building Materials. The City shall condition future development approvals to require that the subsequent project sponsors ensure that any equipment containing polychlorinated biphenyls (PCBs) or plasticizing agent Di(2-ethylhexyl)

⁴ San Francisco Planning Department Archeological Resource Consultant Pool is available online at <http://sf-planning.org/index.aspx?page=3460>. Accessed September 5, 2013.

⁵ Heidi Kline, San Francisco Planning Department, *Transportation Calculations*, April 3, 2013. These calculations are available for review as part of Case File No. 2013.0312U at the San Francisco Planning Department, 1650 Mission Street, Suite 400.

⁶ San Francisco Planning Department Transportation Consultant Pool is available online at http://www.sf-planning.org/ftp/files/MEA/Historic_Resources_consultant_pool.pdf. Accessed September 5, 2013.

phthalate (DEPH), such as fluorescent light ballasts, are removed and properly disposed of according to applicable federal, state, and local laws prior to the start of renovation, and that any fluorescent light tubes, which could contain mercury, are similarly removed and properly disposed of. Any other hazardous materials identified, either before or during work, shall be abated according to applicable federal, state, and local laws.

Because the existing building proposed to be demolished was constructed prior to 1980, asbestos-containing materials, such as floor and wall coverings, may be found in the buildings. 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 that may contain asbestos-containing materials. Also, lead paint may have been used in the existing building. Please contact the San Francisco Department of Building Inspection (DBI) for requirements related to demolition of buildings containing lead paint.

The project includes excavation activities and is located in an area of known serpentine bedrock and soils that may contain naturally-occurring asbestos and require proper removal and disposal in accordance with local, state, and federal regulations.

The proposed project would include excavation of a site formerly occupied by an industrial use. Therefore, the project subject to Article 22A of the Health Code, also known as the Maher Ordinance. The Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, soil and/or groundwater sampling and analysis, as well as remediation of any site contamination, may be required. These steps are required to be completed prior to the issuance of any building permit.

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

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

- e. *Noise.* The project site is within a mapped area where roadway traffic noise exceeds 60 dBA L_{dn} and may require additional noise attenuation be added to the building to meet acceptable interior noise levels of 45 dBA L_{dn} or less. The Eastern Neighborhoods FEIR evaluated potential noise and vibration impacts resulting from implementation of the Area Plan and associated rezoning and found that the project would have significant noise and vibration impacts. However, mitigations measures were identified that would mitigate these significant impacts to a less-than-significant level. The FEIR mitigation measures that would apply to the proposed project are as follows:

Mitigation Measure F-3: Interior Noise Levels. For new development including noise-sensitive uses located along streets with noise levels above 60 dBA (Ldn), as shown in EIR Figure 18, where such development is not already subject to the California Noise Insulation Standards in Title 24 of the California Code of Regulations, the project sponsor shall conduct a detailed analysis of noise reduction requirements. Such analysis shall be conducted by person(s) qualified in acoustical analysis and/or engineering. Noise insulation features identified and recommended by the analysis shall be included in the design, as specified in the San Francisco General Plan Land Use Compatibility Guidelines for Community Noise to reduce potential interior noise levels to the maximum extent feasible.

Mitigation Measure F-4: Siting of Noise-Sensitive Uses. To reduce potential conflicts between existing noise-generating uses and new sensitive receptors, for new development including noise-sensitive uses, the Planning Department shall require the preparation of an analysis that includes, at a minimum, a site survey to identify potential noise-generating uses within 900 feet of, and that have a direct line-of-sight to, the project site, and including 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 Title 24 standards, where applicable, can be met, and that there are no particular circumstances about the proposed project site that appear to warrant heightened concern about noise levels in the vicinity. Should such concerns be present, the Department may require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering prior to the first project approval action, in order to demonstrate that acceptable interior noise levels consistent with those in the Title 24 standards can be attained.

Mitigation Measure F-5: Siting of Noise-Generating Uses. To reduce potential conflicts between existing sensitive receptors and new noise-generating uses, for new development 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, the Planning Department shall require the preparation of 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 including 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 in Police Code Section 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 such concerns be present, the Department may require the completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering prior to the first project approval action.

Mitigation Measure F-6: Open Space in Noisy Environments. To minimize effects on development in noisy areas, for new development including noise-sensitive uses, the Planning Department shall, through its building permit review process, in conjunction with noise analysis required pursuant to Mitigation Measure F-4, require that open space required under the Planning Code for such uses be protected, to the maximum feasible extent, from existing ambient noise levels that could prove annoying or disruptive to users of the open space. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles of urban design.

The proposed project would be subject to the San Francisco Noise Ordinance (Article 29 of the *Police Code*), amended in November 2008, which includes restrictions on noise levels for construction equipment and hours of construction. Detailed information related to construction equipment, phasing, and duration of each phase may be required as part of environmental evaluation to assess construction noise levels and methods to reduce such noise, as feasible. Compliance with the construction noise regulation in the San Francisco Noise Ordinance and other local regulations would fulfill the requirements of **Mitigation Measure F-2: Construction Noise** of the Eastern Neighborhoods FEIR in ensuring that construction noise does not result in any adverse impacts to surrounding uses.

Mitigation Measure F-2: Construction Noise. Where environmental review of a development project undertaken subsequent to the adoption of the proposed zoning controls determines that construction noise controls are necessary due to the nature of planned construction practices and the sensitivity of proximate uses, 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 feasible noise attenuation will be achieved. These attenuation measures shall include as many of the following control strategies as feasible:

- Erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses;
 - Utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site;
 - Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses;
 - Monitor the effectiveness of noise attenuation measures by taking noise measurements;
- and
- 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.

Sufficient information has not been provided with the Preliminary Project Assessment (PPA) application indicating whether or not a pile foundation would be used. In the event that pile-driving would be utilized, the following mitigation measure would apply.

Mitigation Measure F-1: Construction Noise. For subsequent development projects within proximity to noise-sensitive uses that would include pile-driving, individual project sponsors shall ensure that piles be pre-drilled wherever feasible to reduce construction-related noise and vibration. No impact pile drivers shall be used unless absolutely necessary. Contractors would be required to use pile-driving equipment with state-of-the-art noise shielding and muffling devices. To reduce noise and vibration impacts, sonic or vibratory sheetpile drivers, rather than impact drivers, shall be used wherever sheetpiles are needed. Individual project sponsors shall also require that contractors schedule pile-driving activity for times of the day that would minimize disturbance to neighbors.

- f. **Geology and Soils.** The project site is relatively flat and is not within a liquefaction hazard zone. The project sponsor should submit a geotechnical report prepared by a qualified consultant with the EEA. The report should identify any known geotechnical hazards and provide recommendations regarding soil preparation and foundation design and will be used to inform the archeological review.
- g. **Air Quality.** The project sponsor proposes demolition of a single-story industrial building, as well as grading and construction of a new 7-story building on a 37,853-square-foot project site. Project-related demolition, excavation, grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The Eastern Neighborhoods FEIR identified a significant impact related to construction air quality and included **Mitigation Measure G-1: Construction Air Quality** related to construction activities. Subsequently, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred to as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by DBI. Pursuant to the Construction Dust Ordinance, the proposed project would be required to prepare a Dust Control Plan for review and approval of DPH. Please also note that Ordinance 175-91 requires that non-potable water be used for dust control activities. Furthermore, the contractors would be required to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants.

In addition to construction dust, demolition and construction activities would require the use of heavy-duty diesel equipment that emits diesel particulate matter (DPM). DPM is a designated toxic air contaminant, which may affect sensitive receptors located up to and perhaps beyond 300 feet from the project site. Additional measures may be required to reduce DPM emissions from construction vehicles and equipment.

The project site is not within an air quality hot spot, nor it is within an area designated as a Potential Roadway Hazard Zone. Therefore, Health Code Article 38 does not apply to the proposed project. 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.

During the environmental review process, the Planning Department will review the proposed project to determine whether mitigation measures in the form of either construction emissions minimization or air filtration and ventilation mitigation measures will be required and whether any additional mitigation measures identified in the underlying Eastern Neighborhoods Area Plan EIR will be required. Should the project include stationary sources of air pollutants including, but not limited to, diesel boilers or back-up generators, an Air Quality Technical Report may be required for additional air pollutant modeling. If an Air Quality Technical Report is required, the project sponsor must retain a consultant with experience in air quality modeling to prepare a scope of work that must be approved by Environmental Planning prior to the commencement of any required analysis and/or modeling determined necessary.

- h. **Greenhouse Gases.** The 2010 CEQA Air Quality Guidelines provide CEQA thresholds of significance for greenhouse gas (GHG) emissions. On August 12, 2010, the Planning Department submitted to the BAAQMD a draft of the City and County of San Francisco's Strategies to Address Greenhouse Gas Emissions. This document presents a comprehensive assessment of policies, programs and ordinances that collectively represent San Francisco's Qualified Greenhouse Gas Reduction Strategy. The BAAQMD reviewed San Francisco's GHG reduction strategy and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy as outlined in BAAQMD's CEQA Guidelines (2010).⁷ Therefore, projects that are consistent with San Francisco's GHG reduction strategy would result in less-than-significant GHG emissions. The project sponsor would be required to submit a completed GHG Compliance Checklist for Private Development Projects⁸ demonstrating that the project is in compliance with the identified regulations and provide project-level details in the discussion column. This information will be reviewed by the environmental planner during the environmental review process to determine if the project would comply with San Francisco's Greenhouse Gas Reduction Strategy. Projects that do not comply with a GHG-related regulation may be determined to be inconsistent with San Francisco's Greenhouse Gas Reduction Strategy.
- i. **Shadow Study.** The proposed project includes the construction of a building greater than 40 feet in height. The closest public park is the Espirit Park at 20th and Minnesota Streets. A preliminary shadow analysis conducted by the Planning Department indicates that public space under the jurisdiction of the San Francisco Recreation and Parks Department (Espirit Park) would be shadowed by the proposed project, as represented in the plan set submitted with the PPA application. Therefore, a detailed shadow study must be conducted by a qualified shadow consultant to evaluate this potential impact. The Planning Department will provide additional guidance on preparing a detailed quantification of shadow square-foot-hours affecting the pertinent space after submittal of the EEA.
- j. **Stormwater Management.** The project site is located on a block that has been identified by the San Francisco Public Utilities Commission (SFPUC) as having the potential to flood during storms. Applicants for building permits for either new construction, change of use (Planning) or change

⁷ San Francisco's Strategies to Address Greenhouse Gas Emissions and BAAQMD's letter are available online at: <http://www.sfplanning.org/index.aspx?page=1570>. Accessed on September 5, 2013.

⁸ San Francisco Planning Department's Greenhouse Gas Compliance Checklist for Private Development Projects is available online at <http://www.sf-planning.org/index.aspx?page=1886>. Accessed on September 5, 2013.

of occupancy (Building Inspection), or for major alterations or enlargements shall be referred to the SFPUC at the beginning of the process, for a review to determine whether the project would result in ground level flooding during storms. The side sewer connection permits for such projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, the Department of Building Inspection, or the Successor Agency to the San Francisco Redevelopment Agency. Please see the attached information and contact Cliff Wong of the SFPUC at 415- 554-8339.

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 (SCP) that is consistent with the November 2009 Stormwater Design Guidelines. Responsibility for review and approval of the SCP is with the SFPUC Wastewater Enterprise, Urban Watershed Management Program. The 37,853 square-foot project site would be required to prepare a SCP, consistent with this ordinance requirement.

The initial CEQA evaluation of a project will broadly discuss how the Stormwater Management Ordinance is proposed to 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 (LID) approaches would reduce potential negative effects of stormwater runoff. This may include environmental factors such as the natural hydrologic system, city sewer collection system, and receiving body water quality.

- 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 the Tree Disclosure Affidavit with the Environmental Evaluation Application and ensure trees are appropriately shown on site plans.
- l. ***Bird-Safe Building Ordinance.*** The project would be subject to Planning Code Section 139, *Standards for Bird-Safe Buildings*, which addresses Location-Related Standards and Feature-Related Standards. The project's environmental evaluation would generally discuss how the implementation of bird-safe design standards would reduce potential adverse effects on birds due to the lighting, glazing, balconies, and so forth.
- m. ***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.

If any of the additional analyses determine that mitigation measures not identified in the Eastern Neighborhoods FEIR are required to address peculiar impacts, the environmental document will be a community plan exemption and a focused initial study/mitigated negative declaration. If the

additional analyses identify impacts that cannot be mitigated, the environmental document will be a community plan exemption with a focused initial study/EIR. A community plan exemption and a community plan exemption plus a focused initial study/mitigated negative declaration can be prepared by Planning Department staff, but a community plan exemption with a focused initial study/EIR would need to be prepared by a consultant on the Planning Department's environmental consultant pool.⁹ Please see "Studies for Project inside of Adopted Plan Areas - Community Plan Fees" in the Planning Department's current *Fee Schedule for Applications*. Environmental evaluation applications are available at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org.

PLANNING DEPARTMENT APPROVALS:

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

1. A **Certificate of Appropriateness** from the Historic Preservation Commission is required per Planning Code Section 1006. The Historic Preservation Commission will review and approve the demolition of the subject property and the new construction on the subject lot, since it is located within the boundaries of the Dogpatch Landmark District.
2. A **Large Project Authorization** from the Planning Commission is required per Planning Code Section 329 for new construction over 25,000 gsf.
3. **Shadow Analysis:** Based upon the preliminary analysis and submitted materials, the project may have potential shadow impacts on nearby property owned by the San Francisco Recreation and Park Department. During the environmental review, additional shadow analysis is required. Based upon the outcome of this analysis, the project may require approval by the Recreation and Park Commission.
4. A **Building Permit Application** is required for the demolition of the existing building.
5. A **Building Permit Application** is required for the new construction of a four-story multi-family residential-over-retail development.

Certificate of Appropriateness and Large Project 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. Building Permit Applications are available at the Department of Building Inspections at 1660 Mission Street.

NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

Project Sponsors are encouraged to conduct public outreach with the surrounding community and neighborhood groups early in the development process. Additionally, many approvals require a public

⁹ San Francisco Environmental Consultant list is available online at: http://www.sf-planning.org/ftp/files/MEA/Environmental_consultant_pool.pdf. Accessed on September 5, 2013.

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 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 specific Planning Code and other general issues that may significantly impact the proposed project.

1. **Central Waterfront Area Plan.** The proposed project is located within the Eastern Neighborhoods Central Waterfront Plan Area. The Central Waterfront Plan contains a number of objective policies outlining a vision for the neighborhood. The Plan encourages transit and pedestrian-friendly mixed use development that is sensitive to the surrounding area. New housing should provide a range of unit types for a spectrum of income levels. The Plan also strives to protect core PDR (Production, Distribution and Repair) uses, while at the same time transitioning some PDR land to promote a more mixed use character.

The proposed project generally appears to support many goals of the Plan by creating new mixed residential development located near transit. Further review of the Plan's policy language may be helpful for the Project Sponsor to ensure the project complies with the Plan's vision. For specific policy language and background, please see the Central Waterfront Area Plan:

<http://www.sf-planning.org/modules/ShowDocument.aspx?documentid=2015>

2. **Certificate of Appropriateness:** Although the subject property is a non-contributing resource in the Dogpatch Landmark 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 the demolition of the existing building and the new construction of the new residential building. The new construction must be a compatible infill project within the historic district. Since no elevations have been provided, please anticipate design review with Planning Department Preservation staff to ensure compatibility with the surrounding landmark district.

As determined by the HPC through the Certificate of Appropriateness process, the proposed new construction will be reviewed against the criteria offered in Sections 6, 7 and 10 of Appendix L of Article 10 of the San Francisco Planning Code. Please review these criteria and adjust the proposed project accordingly.

3. **Large Project Authorization:** Planning Code Section 329 outlines the requirements for a Large Project Authorization in Eastern Neighborhoods Mixed Use Zoning Districts. A Large Project Authorization

is required of new construction of more than 25,000 gross square feet. All large projects within the UMU Zoning District are subject to review by the Planning Commission in an effort to achieve the objectives and policies of the General Plan, the applicable Design Guidelines and the Planning Code.

As determined by the Planning Commission, exceptions could be sought through the Large Project Authorization, as follows:

- **Rear Yard:** Planning Code Section 134 outlines the requirements for a rear yard within the UMU Zoning District. The minimum rear yard depth shall be equal to 25 percent of the total depth of the lot. The rear yard shall be provided at the lowest story containing a residential dwelling unit. Currently, the proposed project does not meet this requirement, but may seek an adjustment of the rear yard requirement under the Large Project Authorization. Generally, a comparable amount of open area in lieu of a rear yard is encouraged. Please provide the relevant calculations to compare the open space with the required rear yard.
- **Permitted Obstructions:** Planning Code Section 136 outlines requirements for permitted obstructions over useable open space. Currently, an intermediary ramp is identified as a feature over the common useable open space for the proposed dwelling units. This ramp would not be a permitted obstruction over useable open space. However, the project may seek an adjustment of the permitted obstruction requirements under the Large Project Authorization.

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

4. **Open Space:** Planning Code Section 135 outlines the requirements for usable open space per residential unit. Generally, at least 80 sf of useable open space is required for each residential unit. A reduction in useable open space may be allowed if publically accessible. Based upon the number of dwelling units, the proposed project must provide at least 8,800 sq ft of open space. Currently, the proposed project appears to meet this requirement, since the proposed project includes 10,073 sq ft of open space via a landscaped inner courtyard. Further, this landscaped courtyard appears to meet the dimensional requirements specified in the Planning Code.
5. **Street Trees:** The proposed project is subject to the San Francisco Green Landscaping Ordinance, defined in Planning Code Sections 138.1. This Planning Code section outlines a provision for adding street trees when undertaking new construction. 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 ten street trees would be required along Minnesota Street, ten street trees would be required along 20th Street, and ten street trees would be required along Tennessee 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 Planning Code requirement by providing an updated site plan showing landscaping and street trees.

6. **Bettors Streets Plan-Streetscape Plan and Improvements.** Planning Code Section 138.1(2)(i) outlines the requirements for streetscape and pedestrian improvement for projects located on a lot that is greater than ½-acre in total area and encompasses new construction. The proposed project would be required to include streetscape and pedestrian improvements that are in keeping with the Better Streets Plan. 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. Please coordinate with the Department's Citywide Division and Urban Design Team to develop the streetscape and pedestrian improvements. The Planning Department may require these elements as part of conditions of approval.

If street improvements are being considered, project sponsors should contact DPW as early as possible to understand the process and requirements for permitting street improvements. For more information on process, guidelines, and requirements for street improvements, refer to www.sfbetterstreets.org.

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

7. **Exposure:** Planning Code Section 140 outlines requirements for all dwelling units to face an open area. All dwelling units shall feature a window that directly faces an open area that is a minimum of 25 ft in every horizontal dimension that increases five feet in every horizontal dimension on each subsequent floor. Currently, the proposed project features an open area measuring approximately 47-ft wide by 198-ft long on all four levels. Therefore, the proposed project appears to meet exposure requirements.
8. **Parking Screening:** Planning Code Section 142 outlines screening requirements for off-street parking and "vehicle use areas." Every off-street parking area within a building, where not enclosed by solid building walls, shall be screened from view from all streets and alleys through use of garage door or by some other means. Please ensure that the proposed project meets this requirement. In addition, please be sure to include dimensions for openings to vehicular use areas.
9. **Street Frontage-Active Uses:** 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. As the design of the proposed project is developed, please ensure that the ground floor street frontage meets these requirements related to use, height, transparency, fenestration, gates, railings and grillwork. Residential uses are considered active uses if more than fifty percent of the linear residential street frontage at the ground floor level features walk-up dwelling units, which provide direct, individual pedestrian access to a public sidewalk. The design of ground level residential units must meet the Ground Floor Residential Design Guidelines. Please ensure that the proposed project meets this requirement. The Ground Floor Residential Design Guidelines can be found at:
http://www.sf-planning.org/ftp/files/publications_reports/Guidelines_for_Groundfloor_Residential_Design.pdf

10. **Shadow:** 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 cast shadow on Espirit Park, a Recreation & Parks Department property. Please submit a “Shadow Analysis Application” to analyze the shadow impacts. Note: A shadow analysis will be conducted simultaneously with the shadow analysis undertaken as part of the environmental review.
11. **Parking:** Planning Code Section 151.1 outlines requirements for permitted off-street parking. As a project located within the Eastern Neighborhoods Area Plan, there are no minimum parking requirements; rather, the project is subject to a maximum allowance of parking spaces, which is defined as 0.75 parking spaces per unit (See Planning Code Section 151.1, Table 151.1) for dwelling units in the UMU Zoning District. For dwelling units with at least two bedrooms and at least 1,000 square feet of occupied floor area, parking is permitted up to one space for each dwelling, as determined by the Planning Commission through the Large Project Authorization. For retail spaces within a ¼ mile of 3rd Street, one off-street parking space is permitted for each 1,500 sq ft of gross floor area.

The proposed project would construct one hundred ten (110) new residential units; therefore, a maximum of eighty-three (83) off-street parking spaces for the residential units would be permitted for the residential units. For the new commercial space (approximately 2,155 sq ft), one off-street parking space is permitted.

Currently, the proposed project exceeds the permitted amount of parking, as ninety-four (94) parking spaces are currently proposed. Please revise the off-street parking to fall within the limits permitted by Planning Code Section 151.1, or demonstrate that each of the two-bedroom dwelling units contains at least 1,000 square feet of occupied floor area.

12. **Bicycle Parking:** Planning Code Section 155.2 outlines requirements for bicycle parking for new construction. For the 110 new dwelling units, the project is required to provide a total of 103 Class 1 bicycle parking spaces and six Class 2 bicycle parking spaces. Please review the design and layout requirements in the Planning Code for bicycle parking and ensure that the proposed project meets these requirements and design standards.
13. **Unbundled Parking:** Planning Code Section 167 outlines a requirement for unbundled parking spaces for newly constructed residential buildings of ten dwelling units or more. All off-street parking spaces accessory to residential uses shall be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units, such that potential renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space. The Planning Commission may grant an exception from this requirement for projects which include financing for affordable housing that requires that costs for parking and housing be bundled together.
14. **Dwelling Unit Mix:** Planning Code Section 207.6 outlines the requirements for minimum dwelling unit mix for new residential properties within an Eastern Neighborhoods Zoning District. The project must provide either: no less than 40 percent of the total number of proposed dwellings units as at least two bedroom units; or no less than 30 percent of the total number of proposed dwelling units as at least

three bedroom units.

Currently, the proposed project would provide: forty-six (46) two-bedroom dwelling units out of one hundred and ten (110) dwelling units, and would meet this Planning Code requirement.

- 15. Inclusionary Affordable Housing:** Planning Code Section 419.3 outlines the requirement for inclusionary affordable housing as part of any housing project constructing ten or more dwelling units within the UMU Zoning District. The project site is designated as a Tier A for the purposes of evaluating inclusionary affordable housing. All project sites designated as Tier A within the UMU Zoning District shall dedicate 18 percent of the total units as affordable. As stated in Planning Code Section 419.3(b)(1)(A), an alternative to the on-site affordable housing option is to construct off-site affordable housing units at 23 percent of the total number of units. An applicant may also elect to pay a fee to satisfy this requirement. Per Proposition C, which passed in November 2012, the total number of on-site affordable housing units shall be reduced by 20%. Therefore, based upon the current number of dwelling units, if the on-site affordable housing option is elected, the proposed project would be required to provide a total of sixteen (16) on-site affordable housing units.

Based upon the submitted information it is unclear which program the project sponsor will elect to address this requirement. Please clarify how the proposed project would meet this requirement and submit "Inclusionary Affordable Housing Program: Affidavit of Compliance," which may be downloaded from the Planning Department's website under "Permits & Zoning" "Permit Forms."

- 16. First Source Hiring:** Projects involving the new construction of 10 dwelling units or more than 25,000 square feet of residential development are subject to the First Source Hiring Program.

Please contact the First Source Hiring Program Manager with the San Francisco Human Services Agency's Workforce Development Division and submit the *First Source Hiring Program Form*, which is available on the Planning Department's website under "Permits & Zoning" "Permit Forms." This form should be submitted to the Planning Department upon submittal of the first planning entitlement.

- 17. 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: <http://www.sfwater.org/sdq>

Please cite how the proposed project will meet this requirement.

- 18. Eastern Neighborhoods Impact Fees.** Planning Code Section 423 outlines the requirements for development impact fees for projects located within the Eastern Neighborhoods Area Plan. The Eastern Neighborhoods Public Benefits Fund is implemented in part through district-specific Eastern Neighborhoods Impact Fee which applies to the Project Area. The proposed project is subject to Tier 1 EN Impact Fees. The proposed project includes new construction of residential units, and a change in use from PDR to Residential. Please refer to the Citywide Development Fee Register for information on the most current fees. This register may be accessed on the Department of Building Inspection (DBI) website at:

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

These fee amounts are subject to annual review by the City Controller, and may be subject to change. Payment of these impact fees must be received prior to the issuance of the first site permit by DBI of the first site or building permit for a development project. Planning Code Section 423.3 also provides alternatives satisfying this requirement.

Fees shall be assessed per net new gross square footage on residential and non-residential uses within the Plan Area. Fees shall be assessed on mixed use projects according to the gross square feet of each use in the project.

The Eastern Neighborhoods Impact Fee shall be paid before the City issues a first construction document, with an option for the project sponsor to defer payment to prior to issuance of the first certificate of occupancy upon agreeing to pay a deferral surcharge in accordance with Section [107A](#).13.3 of the San Francisco Building Code.

19. **Option for In-Kind Provision of Community Improvements and Fee Credits.** Project sponsors may propose to directly provide community improvements to the City. In such a case, the City may enter into an In-Kind Improvements Agreement with the sponsor and issue a fee waiver for the Eastern Neighborhoods Impact Fee from the Planning Commission, for an equivalent amount to the value of the improvements. This process is further explained in Section 412.3(d) of the Planning Code. More information on in-kind agreements can be found in the Application Packet for In-Kind Agreement on the Planning Department website:

<http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=8601>.

PRELIMINARY DESIGN COMMENTS:

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

1. **Site Design, Open Space, and Massing.** The Planning Department appreciates the orientation and use of the courtyard as a primary organizing element and access to the dwelling units and would like additional detail on the design of the courtyard frontage along 20th Street. The Planning Department encourages the landscaped courtyard to be constructed on-grade such that it would allow mature trees and plantings to match the size and proportions of courtyard space. This courtyard should also be landscaped and designed to provide a gracious and inviting entry sequence from the public to private realms.

The courtyard should be designed in such a manner as to be usable as open space for all residents (including those at the ground level) without compromising privacy or usability.

2. **Vehicle Circulation, Access and Parking.** The Planning Department recommends minimizing the parking footprint and or number of parking spaces.

Bicycle parking is not shown, but should be as close as possible and directly accessible to the lobby or garage entrance to minimize the travel distance through the garage and conflict with automobiles.

3. **Street Frontage.** The ground floor street frontage should provide a consistent and active relationship with the fronting streets, per the Draft Ground Floor Residential Design Guidelines.

The Planning Department recommends a setback of 8-ft to 10-ft for ground floor residential units with direct access from Tennessee or Minnesota Street. These entryways/setback areas may be landscaped to provide a transition from the street. A terrace at the ground level setback may count toward open space.

Please refer to the Draft Ground Floor Residential Design Guidelines for treatment of the building along the street of residential uses on the ground floor. The draft guidelines are located on the Department website under “Resource Center/Department Publications/Guidelines for Ground Floor Residential Design.”

4. **Architecture.** Currently, the architecture appears undeveloped. The Planning Department will provide further detailed design review on the subsequent submission of materials and details to ensure a high quality of design and compatibility with the surrounding landmark district. Since the project is located within the Dogpatch Landmark District, the project should strive for compatibility with the surrounding neighborhood. The architecture and quality of execution should be superior and relate to the adjacent neighborhood. High quality materials combined with exceptional articulation and detailing on all visible facades will be essential to the success of this project.
5. **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. To relevant street types for the project frontage, please refer to:

<http://www.sfbetterstreets.org/design-guidelines/street-types>

The Planning Department recommends corner bulb-outs at Minnesota and 20th Streets, and at Tennessee and 20th Streets. Please coordinate with Department staff to review potential streetscape improvement proposals or explore ideas.

In addition to street trees, the design of the sidewalk furnishing zone should consider special paving, enhanced planting and other site furnishing such as seating, bike racks, and pedestrian lighting.

For more information on process, guidelines, and requirements for street improvements, refer to 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**. An Environmental Evaluation, Conditional Use Authorization, or Building Permit Application, as listed above, must be submitted no later than **March 16, 2015**. Otherwise, this determination is considered expired and a new Preliminary Project Assessment is required. Such applications and plans must be generally consistent with those found in this Preliminary Project Assessment.

Enclosure: Neighborhood Group Mailing List
 Preliminary Shadow Analysis

cc: Andrew Junius, Applicant
 Hekemian Peter, Property Owner
 Rich Sucre, Current Planning
 Heidi Kline, Environmental Planning
 Amnon Ben-Pazi, Citywide Planning and Analysis
 Jerry Robbins, MTA
 Jerry Sanguinetti, DPW